

TSD File Inventory Index

Date: February 20, 2001

Initial: CMG/mra

Facility Name: <u>Tulsa Edison Company (Bayshore Generating Station)</u>		
Facility Identification Number: <u>OHF 000 821-389 (6x filed file)</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
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.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)
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A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
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.1 Correspondence		.2 RFI Workplan
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B.1 Administrative Record		.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP	.7 Lab data, Soil Sampling/Groundwater
.6 RFI QAPP Correspondence	.8 Progress Reports
.7 Lab Data, Soil Sampling/Groundwater	D.5 Corrective Action/Enforcement
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.10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
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.1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
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.5 Stabilization	G.1 Risk Assessment
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.4 CMI Draft/Final Reports	.7 Corrective Action/Remediation Implementation
.5 CMI QAPP	.8 Endangered Species Act
.6 CMI Correspondence	.9 Environmental Justice

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual field per schedule.



August 15, 1980

LOWELL E. ROE
Vice President
Energy Supply
(419) 259-5242

U. S. EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, Illinois 60680

Re: Notification Form EPA 8700-12
The Toledo Edison Company

Gentlemen:

The Toledo Edison Company hereby submits a Notification Form EPA 8700-12 for each of the following facilities:

Acme Generating Station
Bay Shore Generating Station
Delaware Operations Center
Davis-Besse Nuclear Power Station
Lakewood Operations Center
Water Street Station

The information contained within these forms is submitted solely for the purpose of complying with Section 3010 of the Resource Conservation & Recovery Act. In the event of a Freedom of Information filing concerning the information contained within the forms, The Toledo Edison Company requests prior notification before disclosure by the Agency and identification of the party to whom it will be disclosed.

Due to the short time period allowed in which to conduct a company-wide inventory, The Toledo Edison Company specifically reserves the right to make corrections based upon future information. All determinations which have been made are subject to further refinement and there has been no waiver in this regard.

Very truly yours,

THE TOLEDO EDISON COMPANY

Lowell E. Roe
Vice President
Energy Supply

LER:smn

AUG 18 1980



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

OHD000821389

REACKNOWLEDGEMENT

TOLEDO EDISON CO
300 MADISON AVE
TOLEDO

OH 43652

INSTALLATION ADDRESS

4701 BAY SHORE ROAD
OREGON

OH 43616

**A.2 Part A/
Interim Status**

0hd000821389

I.D. - FOR OFFICIAL USE ONLY

W	0	4	0	0	8	2	1	3	8	9	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26 7 23 - 26	2 F 0 0 2 23 - 26 8 23 - 26	3 F 0 0 3 23 - 26 9 23 - 26	4 F 0 0 4 23 - 26 10 23 - 26	5 F 0 0 5 23 - 26 11 23 - 26	6 23 - 26 12 23 - 26
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B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26 19 23 - 26 25 23 - 26	14 23 - 26 20 23 - 26 26 23 - 26	15 23 - 26 21 23 - 26 27 23 - 26	16 23 - 26 22 23 - 26 28 23 - 26	17 23 - 26 23 23 - 26 29 23 - 26	18 23 - 26 24 23 - 26 30 23 - 26
---	---	---	---	---	---

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26 37 23 - 26 43 23 - 26	32 23 - 26 38 23 - 26 44 23 - 26	33 23 - 26 39 23 - 26 45 23 - 26	34 23 - 26 40 23 - 26 46 23 - 26	35 23 - 26 41 23 - 26 47 23 - 26	36 23 - 26 42 23 - 26 48 23 - 26
---	---	---	---	---	---

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>Joseph W. Wright</i>	NAME & OFFICIAL TITLE (type or print) Joseph W. Wright Superintendent, Bay Shore Station	DATE SIGNED 8/14/80
--------------------------------------	--	------------------------

WASTE MINIMIZATION ADDENDUM TO GENERATOR BIENNIAL OR
ANNUAL HAZARDOUS WASTE REPORT FOR 1985

THIS REPORT IS FOR THE CALENDAR YEAR ENDING DECEMBER 31, 1985.

The Hazardous and Solid Waste Amendments of 1984 require all generators of hazardous waste to submit the following information to the United States Environmental Protection Agency or a State authorized to collect such information:

GENERATOR's EPA I.D. No. 10111D000821389

GENERATOR NAME: Bay Shore Generating Station

GENERATOR ADDRESS: 300 Madison Avenue

Toledo, OH 43652

WASTE MINIMIZATION

Describe in the space below your efforts, undertaken during calendar year 1985, to reduce the volume and toxicity of the hazardous waste which your business generates. Also describe changes in waste volume and toxicity actually achieved during 1985 in comparison to previous years, to the extent possible.

The Bay Shore Station minimizes hazardous waste generation by segregating the various types of waste comprising the hazardous waste streams at the facility. This is done in order to avoid creating increased quantities of hazardous mixtures of hazardous and nonhazardous waste. The facility's normal hazardous waste stream is composed primarily of spent degreasing solvents. Waste oils are accumulated separately from waste solvents. Currently, all waste oils at the facility are considered to be nonhazardous.

The amount of waste solvents produced each year varies and is dependent on such items as electrical generating unit maintenance and operations. This facility also occasionally generates nonroutine hazardous wastes. An example is the chromium-bearing waste water produced in 1985. The amount of special waste generated is not predictable, although the generation of such wastes is kept to a minimum.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Joseph E. Murray
PRINT/TYPE NAME

Vice-President
Energy Supply
TITLE

Joseph E. Murray
SIGNATURE

FEB 26 1986
DATE SIGNED

Reviewed 6-19-87
c.j.

**C.2 Compliance/
Enforcement**



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
P.O. Box 466
Bowling Green, Ohio 43402-0466
(419) 352-8461 FAX (419) 352-8468

RECEIVED
CENTER

JAN 06 1995

TRACKING - DHMM, CMBS
TO GO ON: ☒ RCRIS ☒ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG
ENTERED: ☒ RCRIS ☒ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG
RCRIS ENTRY CODES: (EVALUATION) _____ (ENFORCEMENT) _____
CEI ☒ CI ☐ OTHER _____ INITIAL NOV _____ FOLLOW-UP NOV _____
FULL RTC _____ PRTL RTC _____ TCLP ☒ LDR _____ SENT TO USEPA: YES _____ NO _____

George V. Voinovich
Governor

RECEIVED

MAY 18 1992

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 5

Re: Lucas County
Toledo Edison Bay Shore
OHD 000821389
Hazardous Waste

March 9, 1992

Mr. Matt Collins
Toledo Edison
Bay Shore Generating Station
4701 Bay Shore Road
Oregon, Ohio 43616

RECEIVED
OHIO EPA

MAR 12 1992

OHIO ENVIRONMENTAL PROTECTION AGENCY

Dear Mr. Collins:

On March 5, 1992, the Ohio Environmental Protection Agency conducted a hazardous waste compliance evaluation inspection of Toledo Edison Bay Shore Generating Station located in Oregon, Ohio. This inspection was conducted in order to determine Toledo Edison Bay Shore Generating Station's compliance with Ohio's hazardous waste regulations for a generator as adopted under Chapter 3745. of the Ohio Administrative Code (OAC). Toledo Edison Bay Shore Generating Station was represented by Matt Collins and John Keller. The Ohio EPA was represented by Don North and Mike Terpinski. The Agency's inspection included a tour of your facility and a review of written documentation.

Toledo Edison Bay Shore Generating Station generates electricity for its distribution system through the use of coal fired boilers. Hazardous wastes generated at this site include:

1. Petroleum naphtha (D001) from two 30-gallon Safety-Kleen parts washers which are serviced once per month;
2. 1,1,1-trichloroethane (F001) from degreasing, approximately 2 drums per year; and
3. Waste paint (D001 & F003) which is occasionally generated.

During the inspection, the following violations of Ohio's hazardous waste rules were observed and noted:

1. OAC Rule 3745-65-33 Toledo Edison Bay Shore Generating Station does not document a weekly inspection of all required spill control and decontamination equipment, fire and communications equipment.



Mr. Matt Collins
March 9, 1992
Page Two

2. OAC Rule 3745-66-74 Toledo Edison Bay Shore Generating Station does not record the following elements in the inspection log:

- a. time of inspection; and

- b. notation of observations made during the inspection.

In addition to the above noted violations, the Ohio EPA offers the following suggestion for improved operation of your hazardous waste management activities:

1. All parts washers should be closed except when being used for degreasing.

Based on the finding that Toledo Edison Bay Shore Generating Station only generates a small quantity of petroleum naphtha, 1,1,1-trichloroethane, and paint waste, the facility is considered to be a small quantity generator. The rules cited above are requirements for small quantity generators. I have enclosed a copy of the document entitled Understanding the Small Quantity Generator Hazardous Waste Rules: A Handbook for Small Business. If Toledo Edison Bay Shore Generating Station generates a new waste in the future it must properly evaluate the waste to determine all of its hazardous characteristics.

If Toledo Edison Bay Shore Generating Station generates 1000 kg (about 2,200 pounds or 300 gallons) or more of hazardous waste, or more than 1 kg of acutely hazardous waste in any month, or stores more than 6000 kg for longer than 180 days, the facility will become a large quantity generator and will be required to fulfill all applicable hazardous waste management rules. In order to avoid becoming a large quantity generator and to have the documentation to demonstrate the station's status, this Agency suggests that Toledo Edison Bay Shore Generating Station keep a log or record of the hazardous waste that is generated and/or accumulated each month.

It is suggested that Toledo Edison Bay Shore Generating Station resubmit a corrected Notification of Regulated Waste Activity (copy enclosed) to the Ohio EPA at:

Ohio Environmental Protection Agency
Division of Hazardous Waste Management
ATTN: Data Management Section
1800 WaterMark Drive
Columbus, Ohio 43266

Mr. Matt Collins
March 9, 1992
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Explain the station's status as a small quantity generator and the reason that the station is no longer a large quantity generator.

A TC evaluation was performed. No TC wastes were identified.

Please be advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Agency pursuant to Chapter 3734. of the Ohio Revised Code.

Please respond, in writing, to this Notice of Violation (NOV) within ten (10) days. Your response must include all actions and timetables necessary to demonstrate compliance with Ohio's hazardous waste regulations.

Failure to list specific deficiencies in this letter does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the completed inspection form is enclosed for your review. If you have any questions, please contact me immediately.

Sincerely,



Don North
Division of Hazardous Waste Management

/rab

Enclosures

pc: Laurie Stevenson, DHWM, CO
Cindy Lohrbach, DHWM, NWDO
NWDO file

**RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Facility: Toledo Edison Bay Shore Generating Station
USEPA I.D.: DHD 000 821 389 HWFB No.: _____
Street: 4701 Bay Shore Rd
City: Oregon State: Ohio Zip: 43616
County: Lucas Telephone: (419) 249-5580
Owner/Operator: _____
Street: _____
City: _____ State: _____ Zip: _____
Telephone: _____

Inspection Date: 3/5/92 Time: 9:45 - _____

Advance notice of inspection given? (yes) _____ (no) ☒
If so, how far in advance? _____

	<u>Name</u>	<u>Agency/Title</u>	<u>Phone</u>
Inspectors:	<u>Don North</u>	<u>OEPA-NWDO</u>	<u>(419) 352-8461</u>
	<u>Mike Terpinski</u>	<u>OEPA-NWDO</u>	<u>(419) 352-8461</u>
Facility Representative:	<u>Matt Collins</u>	<u>TE</u>	<u>(419) 249-5580</u>
	<u>John Keiter</u>	<u>TE</u>	<u>(419) 249-5580</u>

STATUS

Cond. Exempt SQG _____ SQG ☒ Large Quantity Generator _____
LDR Checklist Attached: (yes) _____ (no) _____

ACTIVITIES

Containers ☒
Tanks _____
Wastepile _____
Landfill _____
Surface Impoundment _____

Used oil burner _____
Hazardous waste fuel burner/blender _____
Incineration/Thermal treatment _____
Land treatment _____
Groundwater monitoring _____

Revised: 1/7/91

REMARKS - GENERAL INFORMATION

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling procedures:

The Bay Shore Generating Station generates electrical energy for the Toledo Edison Company's distribution system, through the combustion of coal.

Bay Shore originally obtained a Part A from HWFAB for container storage. This permit was withdrawn. The facility is currently operating as a small quantity generator.

Hazardous wastes include:

1. Petroleum Naphtha (D001) from (2) 30-gal SK parts washers serviced once per month
2. 1,1,1-trichloroethane^(F001) for degreasing
3. Waste paint (D001, F003) is occasionally generated.

Solvents are used for degreasing equipment, parts and tools.

GENERATOR CLASSIFICATION (OAC 3745-52-34)

Does the facility:

1. Generate < 100 Kg (25-30 gallons) of hazardous waste in a calendar month?

(yes) _____ (no) _____

If so, the facility is classified as a Conditionally Exempt Small Quantity Generator, unless 3.b. applies. Please complete the Conditionally Exempt Small Quantity Generator Requirements checklist.

2. Generate between 100 and 1000 Kg of hazardous waste in a calendar month? (about 25 to under 300 gallons)

(yes) ☒ _____ (no) _____

If so, the facility is classified as a Small Quantity Generator, unless 3.b. applies. Please stop here and complete the Small Quantity Generator Requirements checklist.

3. a. Generate > 1000 Kg (~ 300 gallons) of hazardous waste in a calendar month?

OR;

- b. Generate > 1 Kg of acutely hazardous waste in a calendar month?

(yes) _____ (no) _____

If so, the facility is classified as a Large Quantity Generator. Please complete the Large Quantity Generator Requirements checklist.

REMARKS - GENERATOR CLASSIFICATION

FACILITY INSPECTION WASTE MANAGEMENT ACTIVITIES SUMMARY

DESCRIPTION OF WASTE

ON SITE MANAGEMENT

OFF SITE MANAGEMENT

[illegible]

SMALL QUANTITY GENERATOR (SQG) REQUIREMENTS

WASTE EVALUATION (OAC 3745-52-11)

Y/N/NA RMK #

1. Have the wastes generated at the facility been evaluated as required under 3745-52-11? Y _____

If not, please specify those waste(s) which the SQG has failed to provide an adequate evaluation of:

GENERATOR CLASSIFICATION

2. Do quantities of hazardous waste accumulated on-site ever exceed 6000 kgs? (If so, TSD standards apply. Complete applicable TSD checklists.) [3745-52-34 (D) and (F)] NIA _____

GENERATOR IDENTIFICATION NUMBER (OAC 3745-52-12)

3. Has the generator obtained a U.S. EPA identification number as required under 3745-52-12 prior to treating, storing, disposing, transporting or offering hazardous waste for transport? 040 000 821 389 Y _____

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

4. Are waste streams generated at the facility being shipped off-site under a contractual agreement as defined in OAC 3745-52-20 (F)? Y (1)

If not, the generator is subject to manifest requirements of OAC 3745-52-20 through 3745-52-23. Please complete the Manifest Requirements checklist to document compliance with these requirements.

(1) Safety - Klein petroleum products reclaimed under a contractual agreement.

SQG - EMERGENCY PROCEDURES/PREPAREDNESS AND PREVENTION
(OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

5. Is an emergency coordinator available at all times?
[3745-52-34 (D) (5) (a)]

Y _____

6. Has the following information been posted by the telephone? [3745-52-34 (D) (5) (b)]:

- a. Name and telephone number of emergency coordinator?
b. Location of fire and spill control equipment?
c. Telephone number of local fire department?

Y _____
I _____
I _____

7. Have emergencies been reported to the National Response Center? [3745-52-34 (D) (5) (d)]

(2) Station aware that this must be reported if emer. occurs

N/A (2) _____

8. Are all employees thoroughly familiar with proper handling and emergency procedures? [3745-52-34 (D) (5) (c)]

Y _____

In addition to the above, the small quantity generator must comply with the "Preparedness and Prevention" requirements of OAC 3745-65-30 through 3745-65-37. Please complete the Preparedness and Prevention checklist to document compliance with these requirements.

SQG - ACCUMULATION OF HAZARDOUS WASTES (OAC 3745-52-34)

Y/N/NA RMK #

9. Is the generator accumulating hazardous wastes in containers? If so,

Y _____

- a. Is the date accumulation began clearly marked on each container [3745-52-34 (A) (2)]?
b. Is each container clearly marked with the words "Hazardous Waste" [3745-52-34 (A) (2)]?

I _____
I _____

In addition to the above, if the generator is accumulating hazardous waste in containers, please complete the Management of Containers checklist.

10. Is the generator accumulating hazardous wastes in tanks?

N/A _____

- a. If so, is each tank clearly marked with the words "Hazardous Waste" [3745-52-34 (A) (2)]?

I _____

In addition to the above, if the generator is accumulating hazardous waste(s) in tanks, please complete the Accumulation in Tanks for SQG's checklist.

Y/N/NA RMK ‡

11. Has the generator accumulated hazardous wastes in excess of 180 days (or 270 days if the waste must be transported more than 200 miles)? [3745-52-34(E)]

a. If so, has the generator been granted an extension by the Director for accumulation in excess of 180 days?

N/A

REMARKS - SMALL QUANTITY GENERATOR REQUIREMENTS

MANIFEST REQUIREMENTS (OAC 3745-52-20 TO 3745-52-23)

Y/N/NA RMK #

1. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest, USEPA form 8700-22 in compliance with 3745-52-20 (A)?
 - b. The manifest contains all information required by 3745-52-20 and the minimum number of copies required by 3745-52-22?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20 (C) (D) (E)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23 (A) (1) (2)?
2. Has the generator received a return copy of each completed manifest within thirty-five (35) days of the date the waste was accepted by the initial transporter?
 - a. If not, has the generator complied with the Manifest Exception reporting requirements in 3745-52-42?
3. Are signed copies of all hazardous waste manifests and any documentation required for Exception Reports retained for at least 3 years as required by 3745-52-40?

Y	_____
Y	_____
Y	_____
Y	_____
Y	_____
Y	_____
N/A	_____
Y	_____

REMARKS - MANIFEST REQUIREMENTS

PREPAREDNESS AND PREVENTION (OAC 3745-65-30 TO 3745-65-37)

Y/N/NA RMK #

1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31]
2. Has there been a fire, explosion or non-planned release of waste at the facility since date of last inspection?
 - a. If yes, was the contingency plan implemented? [3745-65-51 (B)]
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32 (A) (B) (C) (D)]
 - a. Internal alarm system?
 - b. Access to telephone, radio or other device for summoning emergency assistance?
 - c. Portable fire control equipment, spill control and decontamination equipment?
 - d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?
4. Is all required spill control and decontamination equipment, fire and communications equipment tested on a weekly basis and maintained as necessary? [3745-65-33]
 - a. Does the facility keep an equipment testing log required by 3745-65-33 (B), including date and time of test, observations made, and date and nature of any repairs?
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34]
6. If required due to the actual hazards associated with the waste, is adequate aisle space maintained to allow unobstructed movement of emergency or spill control equipment? [3745-65-35]
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with possible hazards and facility layout? [3745-65-37 (A)]

Y NA Y 2Y Y Y N 1N 1Y Y Y

8. Where state and local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented?
[OAC 3745-65-37(B)]

N/A _____

REMARKS - PREPAREDNESS AND PREVENTION REQUIREMENTS

1. testing / checks of fire extinguisher ^{spill control equipment etc.} needs to be entered in weekly inspection log of hazardous waste storage area
2. facility states area of unplanned release, etc. will be effectively "quarantined" by roping off

USE AND MANAGEMENT OF CONTAINERS (OAC 3745-66-70 TO 3745-66-77)

Y/N/NA RMK #

1. Are hazardous wastes stored in containers which are:
 - a. Closed? [3745-66-73(A)]
 - b. In good condition? [3745-66-71]
 - c. Compatible with wastes stored in them? [3745-66-72]
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)]
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)]
4. Is the area where containers are stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74]
5. Is the facility recording inspections described in Question #4 in an inspection log or inspection summary as required by OAC 3745-66-74(B) which contains the following information:
 - a. Date and time of inspections?
 - b. Name of inspector?
 - c. Notation of observations made during the inspection?
 - d. The date and nature of any repairs or other remedial action?
6. Are ignitable and/or reactive hazardous waste(s) being managed at the facility? If so,
 - a. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]
 - b. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)]

Y	
Y	
Y	
Y	
N	1
Y	
N	2
Y	
Y	
Y	
Y	

REMARKS - CONTAINER MANAGEMENT REQUIREMENTS

- (1) time of inspection must be written in blank provided on report form.
- (2) results of inspections or problems to be looked for must be recorded on the report form.

Please mail your completed forms to the following address:

**Ohio Environmental Protection Agency
Division of Solid & Hazardous Waste Management
ATTN: Data Management Section
1800 WaterMark Drive
Columbus, Ohio 43266-0149
(614) 644-2977**



EPA

Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Comments

[illegible]

Installation's EPA ID Number														Approved			Date Received (yr. mo. day)		
C										T/A	C								
F											1								

III: Installation Mailing Address

Street or P.O. Box

[illegible]

City or Town															State	ZIP Code			
C																			
4																			

5-III: Location of Installation

Street or Route Number:[illegible]

City or Town															State		ZIP Code		
C																			

IV. Installation Contact

Name and Title (last, first, and job title)	Phone Number
---	--------------

Name and title (last, first, and job title)										(area code and number)					
C															
'															

V. Ownership

A: Name of Installation's Legal Owner	B: Type of Ownership
---------------------------------------	----------------------

[illegible]

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)									
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A. Hazardous Waste Activity	B. Used Oil Fuel Activities
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<input type="checkbox"/> 1a. Generator	<input type="checkbox"/> 1b. Less than 1,000 kg/mo.	<input type="checkbox"/> 6. Off-Specification Used Oil Fuel
<input type="checkbox"/> 2. Transporter		<input type="checkbox"/> a. Generator Marketing to Burner
<input type="checkbox"/> 3. Treater/Storer/Disposer		<input type="checkbox"/> b. Other Marketer
<input type="checkbox"/> 4. Underground Injection		<input type="checkbox"/> c. Burner
<input checked="" type="checkbox"/> 5. Market or Burn Hazardous Waste Fuel		<input type="checkbox"/> 7. Specification Used Oil Fuel Marketer (or On site Burner)
(enter "X" and mark appropriate boxes below)		Who First Claims the Oil Meets the Specification
<input type="checkbox"/> a. Generator Marketing to Burner		
<input type="checkbox"/> b. Other Marketer		
<input type="checkbox"/> c. Burner		

VII: Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only - enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) _____

IX: First or Subsequent Notification

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

<input type="checkbox"/> A. First Notification	<input type="checkbox"/> B. Subsequent Notification (complete item C)	C. Installation's EPA ID Number

C

W

T/A

C

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number 40 CFR Part 261.33 for each chemical substance your installation handles which may be hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24)

☐ 1. Ignitable (D001)
 ☐ 2. Corrosive (D002)
 ☐ 3. Reactive (D003)
 ☐ 4. Toxic (D000)

XI: Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

Date Signed

Estimated burden: Public reporting burden for this collection of information is estimated to be 3 hours, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Line-by-Line Instructions for Completing EPA Form 8700-12

Type or print in black ink all items except Item XI, "Signature," leaving a blank box between words. When typing, hit the space bar once between characters and three times between words. If you must use additional sheets, indicate clearly the number of the item on the form to which the information on the separate sheet applies.

Items I-III — Name, Mailing Address, and Location of Installation:

Completes Items I-III. Please note that the address you give for Item III, "Location of Installation," must be a physical address, *not a post office box or route number*. If the mailing address and physical facility location are the same, you can print "Same" in box for Item III.

Item IV — Installation Contact:

Enter the name, title, and business telephone number of the person who should be contacted regarding information submitted on this form.

Item V — Ownership:

A) Name: Enter the name of the legal owner(s) of the installation, including the property owner. Use additional sheets if necessary to list more than one owner.

B) Type: Using the codes listed below, indicate the legal status of the owner of the facility:

FF = Federally Owned, Federally Operated

FC = Federally owned, Operated by a Private Contractor to the Federal Government

FP = Federally Owned, Privately Operated

PF = Privately Owned, Constructed for Use by The Federal Government and Operated by the Federal Government

PL = Privately Owned, Leased and Operated By

The Federal Government

PI = Privately Owned, Indian Land

FI = Federally Owned, Indian Land

C = County

D = District

M = Municipal

P = Private

S = State

Item VI — Type of Regulated Waste Activity:

A) Hazardous Waste Activity: Mark the appropriate box(es) to show which hazardous waste activities are going on at this installation.

1) Generator:

a) If you generate a hazardous waste that is identified by characteristic or listed in 40 CFR Part 261, mark an "X" in this box

b) In addition, if you generate less than 1000 kilograms of non-acutely hazardous waste per calendar month, mark an "X" in this box.

2) Transporter: If you move hazardous waste by air, rail, highway, or water then mark an "X" in this box. All transporters must complete item VIII. Transporters do not have to complete Item X of this form, but must sign the certification in Item XI. Refer to Part 263 of 40 CFR for an explanation of the Federal regulations for hazardous waste transporters.

3) Treater/Storer/Disposer: If you treat, store or dispose of regulated hazardous waste, then mark an "X" in this box. You are reminded to contact the appropriate addressee listed for your State in Section IV of this package to request Part A of the RCRA Permit Application. Refer to Parts 264 and 265 of 40

CFR for an explanation of the Federal regulations for hazardous waste facility owners/operators.

- 4) **Underground Injection:** Persons who generate and/or treat, store or dispose of hazardous waste must place an "X" in this box if an injection well is located at their installation. An injection well is defined as any hole in the ground, including septic tanks, that is deeper than it is wide and that is used for the subsurface placement of fluids.

- 5) **Market or Burn Hazardous Waste Fuel:** If you market or burn hazardous waste fuel, place an "X" in this box. Then mark the appropriate boxes underneath to indicate your specific activity. *If you mark "Burner" you must complete Item VII — "Type of Combustion Device."*

Note: Generators are required to notify for waste-as-fuel activities only if they market directly to the burner.

"Other Marketer" is defined as any person, other than the generator marketing his or her hazardous waste, who markets hazardous waste fuel.

B) Used Oil Fuel Activities

Mark an "X" in the appropriate box(es) below to indicate which used oil fuel activities are taking place at this installation.

- 6) **Off-Specification Used Oil Fuel:** If you market or burn off specification used oil, place an "X" in this box. Then mark the appropriate boxes underneath to indicate your specific activity. *If you mark "Burner" you must complete Item VII — "Type of Combustion Device."*

Note: Used oil generators are required to notify only if marketing directly to the burner.

"Other Marketer" is defined as any person, other than a generator marketing his or her used oil, who markets used oil fuel.

- 7) **Specification Used Oil Fuel:** If you are the first to claim that the used oil meets the specification established in 40 CFR Part 266.40(e) and is exempt from further regulation, you must mark an "X" in this box.

Item VII -- Waste-Fuel Burning: Type of Combustion Device:

Enter an "X" in all appropriate boxes to indicate type(s) of combustion devices in which hazardous waste fuel or off-specification used oil fuel is burned. (Refer to definition section for complete description of each device.)

Item VIII — Mode of Transportation:

Complete this item only if you are the transporter of hazardous waste. Mark an "X" in each appropriate box to indicate the method(s) of transportation you use.

Item IX — First or Subsequent Notification:

Place an "X" in the appropriate box to indicate whether this is your first or a subsequent notification. If you have filed a previous notification, enter your EPA Identification Number in the boxes provided.

Note: When the owner of a facility changes, the new owner must notify U.S. EPA of the change, even if the previous owner already received a U.S. EPA Identification Number. Because the U.S. EPA ID Number is "site-specific," the new owner will keep the existing ID number. If the facility moves to another location, the owner/operator must notify EPA of this change. In this instance a new U.S. EPA Identification Number will be assigned, since the facility has changed locations.

Item X — Description of Hazardous Waste:

(Only persons involved in hazardous waste activity (Item VI(A)) need to complete this item. Transporters requesting a U.S. EPA Identification Number do not need to complete this item, but must sign the "Certification" in Item XI.)

You will need to refer to Title 40 CFR Part 261 (enclosed) in order to complete this section. Part 261 identifies those wastes that EPA defines as hazardous. If you need help completing this section, please contact the appropriate addressee for your state as listed in Section IV of this package.

Section A — If you handle hazardous wastes that are listed in the "nonspecific sources" category in Part 261.31, enter the appropriate 4-digit numbers in the boxes provided.

Section B — If you handle hazardous wastes that are listed in the "specific industrial sources" category in Part 261.32, enter the appropriate four-digit numbers in the boxes provided.

Section C — If you handle any of the "commercial chemical products" listed as wastes in Part 261.33,

enter the appropriate four-digit numbers in the boxes provided.

Section D — Disregard, since EPA has not yet published infectious waste regulations.

Section E — If you handle hazardous wastes which are not listed in any of the categories above, but do possess a hazardous characteristic, you should describe these wastes by their hazardous characteristic. (An explanation of each characteristic is found at Part 261.21-261.24.) Place an "X" in the box next to the characteristic of the wastes that you handle.

Item XI — Certification:

This certification must be signed by the owner, operator, or an authorized representative of your

installation. An "authorized representative" is a person responsible for the overall operation of the facility (i.e., a plant manager or superintendent, or a person of equal responsibility). *All notifications must include this certification to be complete.*

Estimated Burden:

The box below Item XI "Certification" contains a burden disclosure statement as required by the Office of Management and Budget. This statement explains that the estimated burden to the owner or operator for completing this form is 3 hours. Comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, can be sent to the addresses specified in the statement.

V. Definitions

The following definitions are included to help you to understand and complete the Notification Form:

ACT or RCRA means the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended by the Hazardous and Solid Waste Amendments of 1984, 42 U.S.C. Section 6901 *et seq.*

Authorized Representative means the person responsible for the overall operation of the facility or an operational unit (i.e., part of a facility), e.g., the plant manager, superintendent or person of equivalent responsibility.

Boiler means an enclosed device using controlled flame combustion and having the following characteristics:

- (1) the unit has physical provisions for recovering and exporting energy in the form of steam, heated fluids, or heated gases;
- (2) the unit's combustion chamber and primary energy recovery section(s) are of integral design (i.e., they are physically formed into one manufactured or assembled unit);
- (3) the unit continuously maintains an energy recovery efficiency of at least 60 percent, calculated in terms of the recovered energy compared with the thermal value of the fuel; and
- (4) the unit exports and utilizes at least 75 percent of the recovered energy, calculated on an annual basis (excluding recovered heat used internally in the same unit to, for example, preheat fuel or combustion air or drive fans or feedwater pumps).

Burner means the owner or operator of a utility boiler, industrial boiler or industrial furnace that burns waste-fuel for energy recovery and that is not regulated as a RCRA hazardous waste incinerator.

Disposal means the discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

Disposal Facility means a facility or part of a facility at which hazardous waste is intentionally placed into or on any land or water, and at which waste will remain after closure.

EPA Identification (I.D.) Number means the number assigned by EPA to each generator, transporter, and treatment, storage, or disposal facility.

Facility means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).

Generator means any person, by site, whose act or process produces hazardous waste identified or listed in Part 261 of this chapter or whose act first causes a hazardous waste to become subject to regulation.

Hazardous Waste means a hazardous waste as defined in 40 *CFR* Part 261.

Hazardous Waste Fuel means hazardous waste and any fuel that contains hazardous waste that is burned for energy recovery in a boiler or industrial furnace that is not subject to regulation as a RCRA hazardous waste incinerator. However, the following hazardous waste fuels are subject to regulation as used oil fuels:

- (1) Used oil fuel that is also a hazardous waste solely because it exhibits a characteristic of hazardous waste identified in Subpart C of 40 *CFR* Part 261, provided it is not mixed with hazardous waste; and
- (2) Used oil fuel mixed with hazardous wastes generated by a small quantity generator subject to 40 *CFR* 261.5.

Industrial Boiler means a boiler located on the site of a facility engaged in a manufacturing process where substances are transformed into new products, including the component parts of products, by mechanical or chemical processes.

Industrial Furnace means any of the following enclosed devices that are integral components of manufacturing processes and that use controlled flame combustion to accomplish recovery of materials or energy: cement kilns, lime kilns, aggregate kilns (including asphalt kilns), phosphate kilns, coke ovens, blast furnaces, smelting furnaces, refining furnaces, titanium dioxide chloride process oxidation reactors, and methane

reforming furnaces (and other devices as the Administrator may add to this list).

Marketer means a person who markets hazardous waste fuel or used oil fuel. However, the following marketers are not subject to waste-as-fuel requirements (including notification) under Subparts D and E of 40 *CFR* Part 266:

- (1) Generators and initial transporters (i.e., transporters who receive hazardous waste or used oil directly from generators including initial transporters who operate transfer stations) who do not market directly to persons who burn the fuels; and,
- (2) persons who market used oil fuel that meets the specification provided under 40 *CFR* 266.40(e) and who are not the first to claim the oil meets the specification.

Off-Specification Used Oil Fuel means used oil fuel that does not meet the specification provided under 40 *CFR* Part 266.40(e).

Operator means the person responsible for the overall operation of a facility.

Owner means a person who owns a facility or part of a facility, including land owner.

Specification Used Oil Fuel means used oil fuel that meets the specification provided under 40 *CFR* 266.40(e).

Storage means the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere.

Transportation means the movement of hazardous waste by air, rail, highway, or water.

Transporter means a person engaged in the off-site transportation of hazardous waste by air, rail, highway, or water.

Treatment means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste nonhazardous, or less hazardous; safer to transport, store or dispose of; or amenable for recovery, amenable for storage, or reduced in volume.

Used Oil means any oil that has been refined from crude oil, used, and as a result of such use, is contaminated by physical or chemical impurities. Wastes that contain oils that have not been used

(e.g., fuel oil storage tank bottom clean-out wastes) are not used oil unless they are mixed with used oil.

Used Oil Fuel means any used oil burned (or destined to be burned) for energy recovery including any fuel produced from used oil by processing, blending or other treatment, and that does not contain hazardous waste (other than that generated by a small quantity generator and exempt from regulation as hazardous waste under provisions of 40 *CFR* 261.5). Used oil fuel may itself exhibit a characteristic of hazardous waste and remain subject to regulation as used oil fuel provided it is not mixed with hazardous waste.

Utility Boiler means a boiler that is used to produce electricity, steam or heated or cooled air for sale.

Waste Fuel means hazardous waste fuel or off-specification used oil fuel.

VI. EPA Hazardous Waste Numbers for Waste Streams Commonly Generated by Small Quantity Generators

The Environmental Protection Agency recognizes that generators of small quantities of hazardous waste, many of which are small businesses, may not be familiar with the manner in which hazardous waste materials are identified in *the Code of Federal Regulations*. This insert has been assembled in order to aid small quantity generators in determining for their wastes the EPA Hazardous Waste Numbers that are needed to complete the "Notification of Hazardous Waste Activity," Form 8700-12.

This insert is composed of two tables. Table 1 lists eighteen general industry categories that contain small quantity generators. For each of these categories, commonly generated hazardous waste streams are identified. Table 2 lists EPA Hazardous Waste Numbers for each waste stream identified in Table 1.

To use this insert:

1. Locate your industry in Table 1 to identify the waste streams common to your activities.
2. Find each of your waste streams in Table 2, and review the more detailed descriptions of typical wastes to determine which waste streams actually result from your activities.
3. If you determine that a waste stream does apply to you, report the 4-digit EPA Hazardous Waste Number in Item X of Form 8700-12, "Notification of Hazardous Waste Activity."

The specific instructions for completing Item X (Description of Hazardous Wastes) of the notification form are included in this package. You should note, however, that specific Hazardous Waste Numbers beginning with:

- "F" should be entered in Item X, Section A;
- "K" should be entered in Item X, Section B;
- "P" or "U" should be entered in Item X, Section C; and
- "D" should be entered in Item X, Section

The industries and waste streams described here do not provide a comprehensive list but rather serve as a guide to potential small quantity generators in determining which of their wastes, if any, are hazardous. Except for the pesticide category, this insert does not include EPA Hazardous Waste Numbers for commercial chemical products that are hazardous when discarded unused. These chemicals and their EPA Hazardous Waste Number are listed in 40 *CFR* 261.33.

If the specific Hazardous Waste Number that should be applied to your waste stream is unclear, please refer to 40 *CFR* Part 261, reprinted in the notification package. In those cases where more than one Hazardous Waste Number is applicable, all should be used. If you have any questions, or if you are unable to determine the proper EPA Hazardous Waste Numbers for your wastes, contact your state hazardous waste management agency as listed in Section IV of this notification package, or the RCRA/Superfund Hotline at 1-800-424-9346.

Table 1
Typical Waste Streams Produced by Small Quantity Generators

<u>Industry</u>	<u>Waste Streams</u>
Laboratories	Acids/Bases Heavy Metals/Inorganics Ignitable Wastes Reactives Solvents
Printing and Allied Industries	Acids/Bases Heavy Metals/Inorganics Ink Sludges Spent Plating Wastes Solvents
Pesticide End Users and Application Services	Heavy Metals/Inorganics Pesticides Solvents
Construction	Acids/Bases Ignitable Wastes Solvents
Equipment Repair	Acids/Bases Ignitable Wastes Lead Acid Batteries Solvents
Furniture/Wood Manufacturing and Refinishing	Ignitable Wastes Solvents
Other Manufacturing: 1) Textiles 2) Plastics 3) Leather	Heavy Metals/Inorganics Solvents
Laundries and Dry Cleaners	Dry Cleaning Filtration Residues Solvents
Educational and Vocational Shops	Acids/Bases Ignitable Wastes Pesticides Reactives Solvents
Building Cleaning and Maintenance	Acid/Bases Solvents
Vehicle Maintenance	Acids/Bases Heavy Metals/Inorganics Ignitable Wastes Lead Acid Batteries Solvents
Wood Preserving	Preserving Agents

Typical Waste Streams Produced by Small Quantity Generators (continued)

<u>Industry</u>	<u>Waste Streams</u>
Motor Freight Terminals and Railroad	Acids/Bases Transportation Heavy Metals/Inorganics Ignitable Wastes Lead Acid Batteries Solvents
Funeral Services	Solvents (formaldehyde)
Metal Manufacturing	Acids/Bases Cyanide Wastes Heavy Metals/Inorganics Ignitable Wastes Reactives Solvents Spent Plating Wastes
Chemical Manufacturers	Acids/Bases Cyanide Wastes Heavy Metals/Inorganics Ignitable Wastes Reactives Solvents
Cleaning Agents and Cosmetics	Acids/Bases Heavy Metals/Inorganics Ignitable Wastes Pesticides Solvents
Formulators	Acids/Bases Cyanide Wastes Heavy Meals/Inorganics Ignitable Wastes Pesticides Reactives Solvents

Table 2

Typical Waste Streams and EPA Hazardous Waste Numbers

ACIDS/BASES:

Acids, bases or mixtures having a pH less than or equal to 2 or greater than or equal to 12.5, or liquids that corrode steel at a rate greater than 0.25 inches per year, are considered to be corrosive (for a complete description of corrosive wastes, see 40 *CFR* 261.22. Characteristic of corrosivity). All corrosive materials and solutions have the EPA Hazardous Waste Number of D002. The following are some of the more commonly used corrosives:

Acetic Acid	Oleum
Ammonium Hydroxide	Perchloric Acid
Chromic Acid	Phosphoric Acid
Hydrobromic Acid	Potassium Hydroxide
Hydrochloric Acid	Sodium Hydroxide
Hydrofluoric Acid	Sulfuric Acid
Nitric Acid	

DRY CLEANING FILTRATION RESIDUES:

Cooked powder residue (perchloroethylene plants only), still residues and spent cartridge filters containing perchloroethylene or valclene are hazardous and have an EPA Hazardous Waste Number of F002.

Still residues containing petroleum solvents with a flash point less than 140°F are also considered hazardous, and have an EPA Hazardous Waste Number of D001.

HEAVY METALS/INORGANICS:

Heavy Metals and other inorganic waste materials exhibit the characteristic of EP Toxicity and are considered hazardous if the extract from a representative sample of the waste has any of the specific constituent concentrations as shown in 40 *CFR* 261.24, Table 1. This may include dusts, solutions, wastewater treatment sludges, paint wastes, waste inks and other such materials which contain heavy metals/inorganics (note that wastewater treatment sludges from electroplating operations containing nickel and cyanide, are identified as F006). The following are EP Toxic:

<u>Waste Stream</u>	<u>EPA Hazardous Waste Number</u>
Arsenic	D004
Barium	D005
Cadmium	D006
Chromium	D007
Lead	D008
Mercury	D009
Selenium	D010
Silver	D011

IGNITABLE WASTES:

Ignitable wastes include any flammable liquids, nonliquids, and contained gases that have a flashpoint less than 140°F (for a complete description of ignitable wastes, see 40 *CFR* 261.21. Characteristic of ignitability). Example are spent solvents (see also solvents), solvent still bottoms, ignitable paint wastes (paint removers, brush cleaner and stripping agents), epoxy resins and adhesives (epoxies, rubber cements and marine glues), and waste ink containing flammable solvents. Unless otherwise specified, all ignitable wastes have an EPA Hazardous Waste Number of D001.

Some commonly used ignitable compounds are:

<u>Waste Stream</u>	<u>EPA Hazardous Waste Number</u>
Acetone	F003
Benzene	D001
n-Butyl Alcohol	F003
Chlorobenzene	F002
Cyclohexanone	F003
Ethyl Acetate	F003
Ethylbenzene	F003
Ethyl Ether	F003
Ethylene Dichloride	D001
Methanol	F003
Methyl Isobutyl Ketone	F003
Petroleum Distillates	D001
Xylene	F003

INK SLUDGES CONTAINING CHROMIUM AND LEAD:

This includes solvent washes and sludges, caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead. All ink sludges have an EPA Hazardous Waste Number of K086.

LEAD ACID BATTERIES:

Used lead acid batteries should be reported on the notification form only if they are not recycled. Used lead acid batteries that are recycled do not need to be counted in determining the quantity of waste that you generate per month, nor do they require a hazardous waste manifest when shipped off your premises. (Note: Special requirements do apply if you recycle your batteries on your own premises — see 40 *CFR* Part 266.)

<u>Waste Stream</u>	<u>EPA Hazardous Waste Number</u>
Lead Dross	D008
Spent Acids	D002
Lead Acid Batteries	D008
	D002

PESTICIDES:

Pesticides, pesticide residues, washing and rinsing solutions and dips which contain constituent concentrations at or above the EP Toxicity Level, or have an oral LD50 toxicity (rat) < 50 mg/kg, inhalation LC50 toxicity (rat) < 2 mg/L or a dermal LD 50 toxicity (rabbit) < 200 mg/kg, are hazardous materials. The following pesticides are considered to be hazardous. For a more complete listing, see 40 *CFR* 261.32-33 for specific listed pesticides, and other wastes, wastewaters, sludges, and by-products from pesticide production. (Note that while many of these pesticides are not longer in common use, they are included here for those cases where they may be found in storage.)

PESTICIDES (continued):

<u>Waste Stream</u>	<u>EPA Hazardous Waste Number</u>
Aldicarb	P070
Aldrin	P004
Amitrole	U011
Arsenic Pentoxide	P011
Arsenic Trioxide	P012
Cacodylic Acid	U136
Carbamic Acid, Methylnitroso-Ethyl Ester	U178
Chlordane	U036
Copper Cyanides	P029
1,2-Dibromo-3-Chloropropane	U066
1,2-Dichloropropane	U083
1,3-Dichloropropene	U084
2,4-Dichlorophenoxy Acetic Acid	U240
DDT	U061
Dieldrin	P037
Dimethoate	P044
Dimethylcarbamoyl Chloride	U097
Dinitrocresol	P047
Dinoseb	P020
Disodium Monomomethanearsonate	D004
Disulfoton	P039
Endosulfan	P050
Endrin	P051
Ethylmercuric Chloride	D009
Famphur	P097
Neptachlor	P059
Hexachlorobenzene	U127
Kepone	U142
Lindane	U129
2-Methoxy Mercuric Chloride	D009
Methoxychlor	D014
Methyl Parahtion	P071
Monosodium Methanearsonate	D004
Nicotine	P075
Parathion	P089
Pentachloronitrobenzene	U185
Pentachlorophenol	U242
Phenylmercuric Acetate	D009
Phorate	P094
Strychnine	P108
2,4,5-Trichlorophenoxy Acetic Acid	U232
2-(2,4,5-Trichlorophenoxy)-Propionic Acid	U233
Thallium Sulfate	P115
Thiram	U244
Toxaphene	P123
Warfarin	U248

SOLVENTS:

Spent solvents, solvent still bottoms or mixtures containing solvents are often hazardous. This includes solvents used in degreasing and paint brush cleaning, and distillation residues from reclamation. The following are some commonly used hazardous solvents (see also ignitable wastes for other hazardous solvents, and 40 *CFR* 261.31 for most listed hazardous waste solvents):

<u>Waste Stream</u>	<u>EPA Hazardous Waste Number</u>
Benzene	D001
Carbon Disulfide	F005
Carbon Tetrachloride	F001
Chlorobenzene	F002
Cresols	F004
Cresylic Acid	F004
O-Dichlorobenzene	F002
Ethanol	D001
Ethylene Dichloride	D001
Isobutanol	F005
Isopropanol	D001
Kerosene	D001
Methyl Ethyl Ketone	F005
Methylene Chloride	F001 (Sludges)
	F002 (Still Bottoms)
Naphtha	D001
Nitrobenzene	F004
Petroleum Solvents (Flash- point less than 140F)	D001
Pyridine	F005
1,1,1-Trichloroethane	F001 (Sludges)
	F002 (Still Bottoms)
Tetrachloroethylene	F001 (Sludges)
	F002 (Still Bottoms)
Toluene	F005
Trichloroethylene	F001 (Sludges)
	F002 (Still Bottoms)
Trichlorofluoromethane	F002
Trichlorotrifluoroethane	F002
White Spirits	D001

REACTIVES:

Reactive wastes include reactive materials or mixtures which are unstable, react violently with or form explosive mixtures with water, generate toxic gases or vapors when mixed with water (or when exposed to pH conditions between 2 and 12.5 in the case of cyanide or sulfide bearing wastes), or are capable of detonation or explosive reaction when irritated or heated (for a complete description of reactive wastes, see 40 *CFR* 261.23, Characteristic of reactivity). Unless otherwise specified, all reactive wastes have an EPA Hazardous Waste Number of D003. The following materials are commonly considered to be reactive:

Acetyl Chloride
Chromic Acid
Cyanides
Hypochlorites

Organic Peroxides
Perchlorates
Permanganates
Sulfides

SPENT PLATING AND CYANIDE WASTES:

Spent plating wastes contain cleaning solutions and plating solutions with caustics, solvents, heavy metals and cyanides. Cyanide wastes may also be generated from heat treatment operations, pigment production and manufacturing of anti-caking agents. Plating wastes are generally Hazardous Waste Numbers F006-F009. Heat treatment wastes are generally Hazardous Waste Numbers F010-F012. See 40 *CFR* 261.31 for a more complete description of plating wastes.

WOOD PRESERVING AGENTS:

Compounds or mixtures used in wood preserving, including the wastewater treatment sludge from wastewater treatment operations, are considered hazardous. Bottom sediment sludges from the treatment of wastewater processes that use creosote or pentachlorophenol are hazardous, and have an EPA Hazardous Waste Number of K001. Unless otherwise indicated, specific wood preserving components are:

<u>Waste Stream</u>	<u>EPA Hazardous Waste Number</u>
Chromated Copper Arsenate	D004
Creosote	K001
Pentachlorophenol	K001

Ohio EPA

Re: Lucas County
Hazardous Materials
Bayshore Generating Station
HWFAB #03-48-0277

STATUS 0

June 16, 1983

Mr. Robert Grosjean
Bayshore Generating Station
Toledo Edison Company
4701 Bayshore Road
Toledo, OH 43616

OH0000821389

Dear Mr. Grosjean:

On May 19, 1983, I conducted a RCRA Interim Status Standards inspection of your facility which was represented by Ken Maurer and Elaine Moore. The facility was found to be in compliance with all applicable State and Federal regulations.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the form completed during the inspection is enclosed. If you have any questions about the inspection, please call me at 352-8461.

Sincerely,



David L. Ferguson
Division of Hazardous Materials Management

DLF/kb

Enclosure

cc: Kenneth Maurer
cc: Ken Westlake, U.S.EPA, Region V w/encl. ✓
cc: Paula Cotter, DHMM, CO w/encl.

May 19, 1983
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 03-48-0277

PART 1. GENERAL INFORMATION

U.S. EPA I.D. # OH.D00821389

Facility: Raysham Generating Station, Toledo Edison Co. Address: 4701 Raysham Rd. City: Toledo
State: OH Zip Code: 43616 County: Lucas Telephone: 419-259-5185

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Elaine Moore</u>	<u>Assistant Engineer</u>	<u>Same as above</u>
2.	<u>Ken Maurer</u>	<u>Environmental Technologist</u>	<u>" " "</u>
3.			

INSPECTOR(S)

1.	<u>Alice Ferguson</u>	<u>Env. Eng. 2, OEPA</u>	<u>419-352-8461</u>
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☒ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which regulations are applicable.

- | | |
|---|---|
| <input type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure | <input type="checkbox"/> Waste Piles S03 |
| <input checked="" type="checkbox"/> Containers S01 | <input type="checkbox"/> Land Treatment D81 |
| <input type="checkbox"/> Tanks S02/T01 | <input type="checkbox"/> Landfills D80 |
| <input type="checkbox"/> Surface Impoundments S04/T02 | <input type="checkbox"/> Chemical/Physical/Biological T04 |
| <input type="checkbox"/> Incineration/Thermal Treatment | <input type="checkbox"/> Groundwater Monitoring |
| | <input type="checkbox"/> Post-Closure |

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>—</u>	<u>✓</u>	<u>—</u>	<u>—</u>

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

The Bayshore Generating Station generates electrical energy for the Toledo Edison Distribution System.

Although the Facility was inspected as a generator (TSO), it is acting as a generator and has asked for a withdrawal of the permit. No waste has been on site for over 90 days.

The waste consists of solvents used in degreasing of equipment, parts, and tools - both halogenated (chlorinated) and non-halogenated, F001-F005.

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention

D: Contingency and Emergency
E: Manifest/Records/Reporting

G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. a) Physical contact with the waste, structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
IF <u>BOTH</u> 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, <u>or</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Physical separation of incompatible waste materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)
 - a) Internal alarm system.
 - b) Access to telephone, radio or other device for summoning emergency assistance.
 - c) Portable fire control equipment.
 - d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a))
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b))

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1))
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 - e) The present physical location of each hazardous waste within the facility.
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2))
 - g) Records of any waste analyses and trial tests required to be performed.
 - h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).
 - j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)
- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))
- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)
- a) A description of how and when the facility will be closed. (265.112(a)(1)).

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	✓	___	___	___
b) In good physical condition (265.171)	✓	___	___	___
c) Compatible with the wastes stored in them (265.172)	✓	___	___	___
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	✓	___	___	___
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	✓	___	___	___
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	✓	___	___	___
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	✓	___	___	___
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	✓	___	___	___

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	—	—	✓	—
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.(NOTE: Maximum inventory should agree with the permit.)	✓	—	—	—
d) A description of steps taken to decontaminate facility equipment.	✓	—	—	—
e) The year closure is expected to begin and a schedule for the various phases of closure.	✓	—	—	—
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	—	—	✓	—
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)				
a) A closure trust fund, or	—	—	—	—
b) A surety bond, or	—	—	—	—
c) A closure letter of credit, or	—	—	—	—
d) A combination of financial mechanisms.	✓	—	—	—

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
------------	-----------	------------	-----------------

<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
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REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS



Re: Lucas County
Hazardous Materials
Toledo Edison Company
HWFAB #03-48-276, 277, 278, 279

Mr. Kenneth Mauer
Associate Environmental Technologist
Environmental Activities Division
Toledo Edison Company
300 Madison Avenue
Toledo, OH 43652

July 27, 1982

Dear Ken:

On May 10, 1982, Dave Ferguson, Ohio EPA Northwest District Office, conducted an inspection of your facilities which included Bay Shore Generating Station, Acme Generating Station, and Delaware Operations Center. All three sites were represented by yourself.

On June 29, 1982, Dave Ferguson conducted an inspection of the Davis-Besse Nuclear Power Station which was represented by yourself and Bill Mills.

All four facilities were found to be in compliance with all applicable State and Federal regulations. A copy of the form completed during the inspections is enclosed. If you have any questions about the inspection, please call me at 352-8461.

Sincerely,

David L. Ferguson
Environmental Scientist

DLF/kb

Enclosure

cc: Kathy Homer, U.S. EPA, Region V w/encl.
cc: Paula Cotter, DHM, CO w/encl.
cc: Bob Fragale, HWFAB w/encl.

RECEIVED

AUG 3 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

RECEIVED

AUG 3 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

State of Ohio Environmental Protection Agency
Northwest District Office
1035 Devlac Grove Drive, Bowling Green, Ohio 43402-4598 (419) 352-8461

James A. Rhodes, Governor
Wayne S. Nichols, Director

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OH D000821389

Facility: Bayshore Generating Sta. Address: 4701 Bayshore Rd. City: ToledoState: Ohio Zip Code: 43616 County: Lucas Telephone: (419) 259-5185Facility Operator: same Title: _____ Telephone: _____Facility Owner: Toledo Edison Address: 300 Madison Ave.City: Toledo State: Ohio Zip Code: 43652 Telephone: (419) 259-5185Type of Ownership: ☒ Private _____ Government State HWFAB No. 03-48-277Date of Inspection: 5-10-82 Time of Inspection: (Start) _____ (Finish) _____Advance Notification? ☐ No ☒ Yes: _____Weather Conditions: Sunny and cool

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Kenneth Mauer</u>	<u>Env. Technologist</u>	<u>(419) 259-5185</u>
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____

INSPECTOR(S)

(Title)

1.	Dave Ferguson	Env. Scientist	(419) 352-8461
2.			
3.			
4.			

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: F001, F002, F003, F004, F005

b) Non-Listed Wastes: D001 I D002 C D003 R D000 T

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

Yes, See Remark #

☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____

☒ No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.)

☒ No

a) Applicable U.S. EPA I.D. Number _____

b) Ohio P.U.C.O. GR TRSF Number _____

7. A brief description of site activity:

The Bay Shore Generating Station generates electrical energy for the Toledo Edison Company's distribution system.

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u> </u>	<u> </u>	<u>✓</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)	✓	—	—	—
a) Inspect emergency equipment.	✓	—	—	—
b) Inspect monitoring equipment.	✓	—	—	—
c) Inspect security, alarm and communications devices.	✓	—	—	—
d) Inspect process equipment (pipes, pumps, etc.).	✓	—	—	—
e) Inspect containment structures (dikes, curbs, etc.).	✓	—	—	—
f) Inspect facility for structural malfunctions (roof, floor, etc.).	✓	—	—	—
g) Inspect hazardous waste handling/loading areas each day used.	✓	—	—	—
h) Record of any malfunctions due to equipment or operator errors.	✓	—	—	—
i) Record of any hazardous waste discharges.	✓	—	—	—
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	✓	—	—	—
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	✓	—	—	—
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	✓	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
b) Physical separation of incompatible waste materials.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<u>—</u>	<u>✓</u>	<u>—</u>	<u>—</u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
a) Internal alarm system	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
c) Portable fire control equipment.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|---|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B). | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

Subpart D: Contingency and Emergency

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components: | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| a) Actions to be taken by personnel in the event of an emergency incident. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) Arrangements or agreements with local or state emergency authorities. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| d) A list of all emergency equipment including location, physical description and outline of capabilities. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	_____

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c) The estimated (or actual) weight, volume or density of the waste material(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g) Records of any waste analyses and trial tests required to be performed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1 ^{Dec 31}) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable; the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	—	—	—	—
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	—	—	—	—
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.	—	—	—	—
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	—	—	—	—

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

- | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|------------|-----------|------------|-----------------|
| _____ | _____ | _____ | _____ |
| _____ | _____ | _____ | _____ |

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

- | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|-------------------------------------|--------------------------|-------------------------------------|-----------------|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	—	—	✓	—
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	—	—	✓	—
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	—	—	✓	—
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	—	—	✓	—
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	—	—	✓	—

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	—	—	—	—
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	—	—	—	—
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	—	—	—	—
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	—	—	—	—

RCRA INTERIM STATUS INSPECTION FORM

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Yes No N/A Remark #

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

✓ _____

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).

Yes No N/A Remark #

_____ _____ ✓ _____

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-foot cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.

_____ _____ _____ _____

2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).

_____ _____ _____ _____

3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).

_____ _____ _____ _____

4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).

_____ _____ _____ _____

5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).

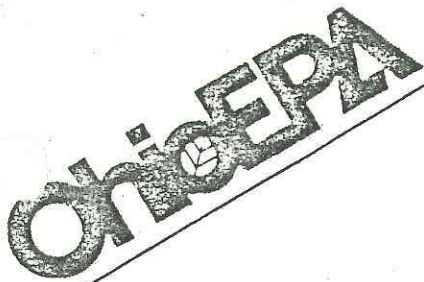
_____ _____ _____ _____

- a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.

_____ _____ _____ _____

- b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

_____ _____ _____ _____



Re: Application Number 81-HW-0277
Lucas County

August 26, 1981

Kenneth Mauer, Technologist
Toledo Edison Co., Bay Shore Generating Station
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Mauer:

On July 24, 1981, Dave Ferguson of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Joe Wright.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written over the typed name.

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: ✓ Kathleen Homer, U.S. EPA, Region V
Dave Ferguson, NWDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 14W-81-0277

OWNER - TOLEDO EDISON

FACILITY NAME - BAYSHORE GENERATING STATION

FACILITY LOCATION - 4701 BAYSHORE RD, TOLEDO, O. 43616

FACILITY CONTACT - KENNETH MAUER, TECHNOLOGIST PHONE NO. -

ISS INSPECTION DATE - 7-24-81

(419)

259-5185

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
5	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
	E	3795-55-35	265.35			
6	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53			
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
VI	A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"			
	g	"	"	B		
9	VII A 1	3745-56-03	265.112			
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142	B		
	B 1	3745-56-09	265.118			
VIII	I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265.192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265.193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

F	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
	B	1	3745-57-79	265.309		
			2	"	"	
	C	1	3745-56-03	265.112		
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
	E	1	3745-57-83	265.313		
			3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
			2	"	"	
			3	"	"	
			4	"	"	
16	G	1	3745-57-85	265.315		
	I	B	1	3745-58-33	265.373	
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	
	II	A	1a	3745-58-35	265.375	
			b	"	"	
			c	"	"	
17		2a	3745-58-35	265.375		
		b	"	"		
	B	1	"	"		
			"	"		
			"	"		
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			"	"		

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
IX I (A)		3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
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20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	3745-52-42	262.42			
	(C)	3745-52-42	262.42			
2	(A)	3745-52-30	262.30			
	(B)	3745-52-31	262.31			
	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

IDENTIFICATION NUMBER

87-HW- 0277
0277

EPA IDENTIFICATION NUMBER

OH0600821389

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: BAYSHORE GENERATING STATION
(B) Street: 4701 BAYSHORE RD
(C) City: TOLEDO (D) State: OH (E) Zip Code: 43616
(F) Phone: 419-259-5185 (G) County: Lucas
(H) Operator: Same
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: Toledo Edison
(P) Street: 311 Madison Ave
(Q) City: Toledo (R) State: OH (S) Zip Code: 43652
(T) Phone: _____ (U) County: Lucas
(V) Date of Inspection: 7/24/77 (W) Time of Inspection (From) _____ (To) _____
(X) Weather Conditions: _____

(Y) Person(s) Interviewed

Title

Telephone

JOE WRIGHT

MAN. SUPERVISOR

BOB GRESTER

GEN. MGT. ENG.

DEBBE (E)

ATTORNEY

419/259-5414

(Z) Inspection Participants

KEN MAUREL

ENV. TECHNOLOGIST

419/259-5135

Dave Ferguson

Env. Scientist

419-352-8400

Tom Wray

HAZ. WASTE SCIENTIST

"

(AA) Preparer Information

Name

Agency/Title

Telephone

Tom Wray

HAZ. WASTE SCI

"

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment

- 1 1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

 B. Land Treatment (M)

 C. Landfills (N)

 D. Incineration and/or Thermal Treatment (O and P)

 E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste, complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

Yes No NI* Remark

(A) Has the Regional Administrator been notified regarding:

- | | | | | |
|--|------------|-------|-------|-------|
| 1. Receipt of hazardous waste from a foreign source? | <u>N/A</u> | _____ | _____ | _____ |
| 2. Facility expansion? | <u>N/A</u> | _____ | _____ | _____ |

(B) General Waste Analysis:

- | | | | | |
|---|----------|-------|-------|-------|
| 1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | <u>X</u> | _____ | _____ | _____ |
| 2. Does the owner or operator have a detailed waste analysis plan on file at the facility? | <u>X</u> | _____ | _____ | _____ |
| 3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | <u>X</u> | _____ | _____ | _____ |

(C) Security - Do security measures include:
(if applicable)

- | | | | | |
|---|----------|-------|-------|-------|
| 1. 24-Hour surveillance? | <u>X</u> | _____ | _____ | _____ |
| 2. Artificial or natural barrier around facility? | <u>X</u> | _____ | _____ | _____ |
| 3. Controlled entry? | <u>X</u> | _____ | _____ | _____ |
| 4. Danger sign(s) at entrance? | _____ | _____ | _____ | _____ |

(D) Do Owner or Operator Inspections Include:

- | | | | | |
|-------------------------------|----------|-------|-------|-------|
| 1. Records of malfunctions? | <u>X</u> | _____ | _____ | _____ |
| 2. Records of operator error? | <u>X</u> | _____ | _____ | _____ |
| 3. Records of discharges? | <u>X</u> | _____ | _____ | _____ |

III GENERAL FACILITY STANDARDS - continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	-----
5. Safety, emergency equipment?	<u>X</u>	---	---	-----
6. Security devices?	<u>X</u>	---	---	-----
7. Operating and structural devices?	<u>X</u>	---	---	-----
8. Inspection log?	<u>X</u>	---	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	---	---	-----
2. Job descriptions?	<u>X</u>	---	---	-----
3. Description of training?	<u>X</u>	---	---	-----
4. Records of training?	<u>X</u>	---	---	-----
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	---	---	-----
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>N/A</u>	---	---	-----
2. No smoking signs?	---	---	---	-----
3. Separation and protection from ignition sources?	---	---	---	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes	No	NI*	Remarks
-----	----	-----	---------

_____ X _____

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?
2. Telephone or 2-way radios at the scene of operations?
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X _____ _____ _____

X _____

Indicate the volume of water and/or foam available for fire control:

1200 gal/min ; back-up 1500 gal/min

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

Y _____ _____ MONTHLY

2. Is emergency equipment maintained in operable conditions?

- (D) Has owner or operator provided immediate access to internal alarms? (if needed)

(E) Is there adequate aisle space for unobstructed movement?

X — —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X — —

X — —

X — —

X — —

X — —

Safety Admin.

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	—	—	
 (C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	—	—	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	—	—	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	—	—	
 (Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
	<u>NI</u>	<u>X</u>	—	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>X</u>	—	—	
2. Are records of past shipments retained for 3 years?	<u>X</u>	—	—	
 (B) Does the owner or operator meet requirements regarding manifest discrepancies?				
	<u>X</u>	—	—	

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X — — —

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X — — —

- c. The location and quantity of each hazardous waste within the facility?

X — — —

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A — — —

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — — —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

X — — —

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

X — — —

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>X</u>	___	___	_____
2. Has this plan been submitted to the Regional Administrator	___	<u>X</u>	___	_____
3. Has closure begun?	___	<u>X</u>	___	_____
4. Is closure estimate available by May 19, 1981?	___	<u>X</u>	___	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	___	<u>N/A</u>	___	_____

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

**I
USE AND MANAGEMENT OF CONTAINERS**

Facility Name: WYOMING GENERATING UNIT Date of Inspection: 1/27/81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>X</u>	___	___	_____
2. Are containers compatible with waste in them?	<u>X</u>	___	___	_____
3. Are containers stored closed?	<u>X</u>	___	___	_____
4. Are containers managed to prevent leaks?	<u>X</u>	___	___	_____
5. Are containers inspected weekly for leaks and defects?	<u>X</u>	___	___	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	___	<u>N/A</u>	___	_____

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

N/A

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

N/A

J
TANKS

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

3. Do continuous feed systems have a waste-feed cutoff?

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

5. Are required daily and weekly inspections done?

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<u>X</u>	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>X</u>	_____	_____	_____

	Yes	No	NA*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	—	—	—
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	—	—	—
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>	—	—	—
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	—	—	—
7. Required certification?	<u>X</u>	—	—	—
8. Required signatures?	<u>X</u>	—	—	—
(C) Does the owner or operator submit exception reports when needed?	<u>X</u>	—	—	—

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	—	—	—
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	—	—	—
(C) If required, are placards available to transporters of hazardous waste?	<u>X</u>	—	—	—

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - 14W-81-0277

OWNER - TOLEDO EDISON

FACILITY NAME - BAYSHORE GENERATING STATION

FACILITY LOCATION - 4701 BAYSHORE RD., TOLEDO, O. 43616

FACILITY CONTACT - KENNETH MAUER, TECHNOLOGIST PHONE NO. -

ISS INSPECTION DATE - 7-24-81

(419)
259-5185

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
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	3	"	"			
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	B 1	3745-55-32	265.32			
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	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
6	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53			
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	3	"	"			
	D 1	3745-55-56	265.56			
VI	A 1	3745-55-71	265.71			
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	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
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	e	"	"			
	f	"	"			
	g	"	"	B		
9	VII A 1	3745-56-03	265.112			
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	3	"	"			
	4	3745-56-32	265.142	B		
	B 1	3745-56-09	265.118			
VIII	I 1	3745-56-51	265.171			
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	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265.192			
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	3	"	"			
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	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
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	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

ge	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
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		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
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		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
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			4	"	"	
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			4	3745-56-32	265.192	
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			3745-55-17	265.17(b)		
15	E	1	3745-57-83	265.313		
			3745-55-17	265.17(b)		
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			3	"	"	
	G	1	3745-57-85	265.315		
16	I	B	1	3745-58-33	265.373	
			2	"	"	
			3	"	"	
			4	"	"	
			5	"	"	
	II	A	1a	3745-58-35	265.375	
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			c	"	"	
			2a	3745-58-35	265.375	
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			1	"	"	
17	B	2	"	"		
		3	"	"		
		4	"	"		
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	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
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	(C)	3745-52-33	262.33			
21	3 1	3745-52-34	262.34			
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	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

**D. Corrective
Action**

Determination: NFA

PA/VSİ Or RFA FILE REVIEW CHECKLIST

Facility Name: Toledo Edison (Bay Shore Gen. Stat.) _____

EPA ID: OH 000 821 389 _____ City: Oregon _____ State: OH _____

Name of Reviewer: Maureen McHugh _____ Date of Review: 7/25/08 _____

1	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Is this a one folder site?
2	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there Superfund files for this site?
3	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you Read the Executive Summary?
			There are: <u> 5 </u> SWMUs and <u> 0 </u> AOCs at this site.
4	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you review the regulatory history?
5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Does the facility have interim status or a permit?
			This facility is a: <u> X </u> (CE)SQG, <u> </u> LQG, or <u> </u> Less than 90 day.
6	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Was the Facility closed per RCRA?
			If Yes, was the closure: <u> </u> CC, or <u> </u> CIP.
7	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Are there documented (historical) releases? Briefly describe on Page 2.
8	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSİ or RFA file, please classify this site as:

 X No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

 Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

 More Information Needed: There is no RFA, PA/VSİ or RCRA closure information available.

PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes

ISCV 1984 for the drum storage area. Area is enclosed, has a concrete floor, and there have been no documented releases.

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

PA/VSI Recommendations

NFA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

RECEIVED
WMD RCRA
RECORD CENTER

MAY 06 1993

Camp

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Ray Zucker
Centerior Energy
6200 Oak Tree Blvd.
Independence, Ohio 44131

Re: Visual Site Inspection
Toledo Edison Company's
Bay Shore Generating Station
Oregon, Ohio
OHD 000 821 389 ✓

Dear Mr. Zucker:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED JAN 25 1993
WMD RCRA
RECORD CENTER PA/VI

REPLY TO THE ATTENTION OF:

HRE-8J

January 25, 1993

Mr. Ray Zucker
Centerior Energy
6200 Oak Tree Boulevard
Independence, Ohio 44131

Re: Visual Site Inspection
Acme Generating Station
Toledo, OH
ID No. OHD 000 821 371
Bay Shore Station
Oregon, OH
ID No. OHD 000 821 389

Dear Mr. Zucker:

As indicated in the letter of introduction sent to you on August 4, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

1940 12 1

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

August 4, 1992

Mr. Ray Zucker
Centerior Energy
6200 Oak Tree Blvd.
Independence, OH 44131

Re: Visual Site Inspection
ACME Generating Station
Toledo, OH
ID No. OHD 000 821 371
AND
Bay Shore Station
Oregon, OH
ID No. OHD 000 821 389

Dear Mr. Zucker:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for August 13, 1992 at 8:00 a.m. The inspection team will consist of Sandy Anagnostopoulos and Cathy Collins of PRC Environmental Management, Inc., a contractor

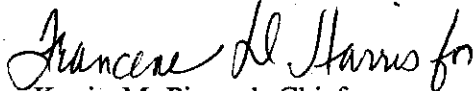
Mr. Ray Zucker
August 4, 1992
Page 2

for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Francene Harris for".

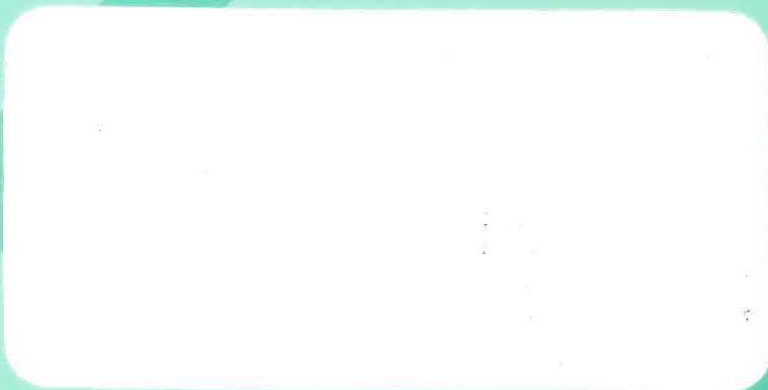
Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Matt Collins, Toledo Edison
Don North, OEPA Northwest District Office
Ed Lim, OEPA Central Office



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**

PRC

PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**TOLEDO EDISON COMPANY'S
BAY SHORE GENERATING STATION
OREGON, OHIO
OHD 000 821 389**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 000 821 389
Date Prepared	:	January 26, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH6L
Prepared by	:	PRC Environmental Management, Inc. (Sandy Anagnostopoulos)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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B	VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
C	VISUAL SITE INSPECTION FIELD NOTES

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) at Toledo Edison Company's (Toledo Edison) Bay Shore Generating Station (Bay Shore) in Oregon, Lucas County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from the SWMUs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The Bay Shore facility is a coal-fired electric generating station used to provide power to customers in northwest Ohio. The facility generates and manages the following waste streams: waste 1,1,1-trichloroethane (F001), waste petroleum naphtha (D001), waste paint solvent (F003), used compressor oil, used transformer oil, fly ash, coal pile runoff, bottom ash, and boiler chemical cleaning solution.

The facility has operated at its current location since 1955. The facility occupies 580 acres in a mixed-use area. Bay Shore works closely with Toledo Edison's Acme Generating Station, which is located approximately 5 miles southwest of the Bay Shore facility. Toledo Edison employees work between the two stations. Together the facilities employ 386 people.

From 1980 to 1984, the facility was regulated as a large-quantity generator, treatment, storage, or disposal (TSD) facility, and transporter of hazardous wastes. In September 1984, EPA began regulating Bay Shore as a small-quantity generator storing waste for less than 90 days. The facility's status has not changed since 1984.

From 1955 to 1986, the property was owned and operated by Toledo Edison. In 1986, Toledo Edison merged with Cleveland Electric Illuminating Company (CEI) to form Centerior Energy. Both Toledo Edison and CEI are wholly-owned subsidiaries of Centerior Energy. The merger was primarily a managerial one, leaving operations at Bay Shore unchanged. Toledo Edison exists to handle debts and customer billing and will be referred to throughout this report.

The PA/VSI identified the following five SWMUs and no AOCs at the facility:

RELEASED
DATE 4/22/01
RIN #
INITIALS cmw

ENFORCEMENT
CONFIDENTIAL

Solid Waste Management Units

1. Drum Storage Area
2. Fly Ash Collection System
3. Retired Fly Ash Pond
4. Wastewater Treatment System 1
5. Wastewater Treatment System 2

The nearest residence to Bay Shore is located 0.1 mile northwest of the facility. Bay Shore is surrounded by an 8-foot chain-link fence that is topped with barbed wire. There is a guard on duty 24 hours a day, and the facility is equipped with security cameras. Ground water is not used as a municipal or drinking water supply but is used for industrial purposes in the area. Sensitive environments are located adjacent to the facility and on site. Maumee Bay borders the facility on the north and northeast. Maumee Bay is used for recreational purposes. A wetland of approximately 4 acres is located at the southeast end of the facility.

The potential for release from the Drum Storage Area (SWMU 1) and the Fly Ash Collection System (SWMU 2) to ground water, surface water, air, and on-site soils is low, since SWMUs 1 and 2 are in good condition and appropriate for the wastes managed. The potential for release from the Retired Fly Ash Pond (SWMU 3) and Wastewater Treatment Systems 1 and 2 (SWMUs 4 and 5) to ground water, surface water, and air is low since SWMUs 3, 4, and 5 are in good condition and appropriate for the wastes managed. Normal operations of SWMUs 3, 4, and 5 constitute a release to on-site soils. However, the nonhazardous nature of the wastes managed by SWMUs 3, 4, and 5 allows these SWMUs to operate with minimal threat to human health and the environment.

PRC recommends that no further action be taken for any of the SWMUs at the Bay Shore facility.

RELEASED
DATE 2/20/01
RIN #
INITIALS

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI conducted at the Toledo Edison Company's (Toledo Edison) Bay Shore Generating Station (Bay Shore) (EPA Identification No. OHD 000 821 389) in Oregon, Lucas County, Ohio. The PA was completed on August 12, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA), the Ohio Department of Natural Resources (ODNR), and EPA Region 5 RCRA files. The VSI was conducted on August 13, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified five SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and eight inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The Bay Shore facility is located at 4701 Bay Shore Road in Oregon, Lucas County, Ohio. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 41°41'30" N and longitude 83°26'18" W). The facility occupies 580 acres in a mixed-use area.

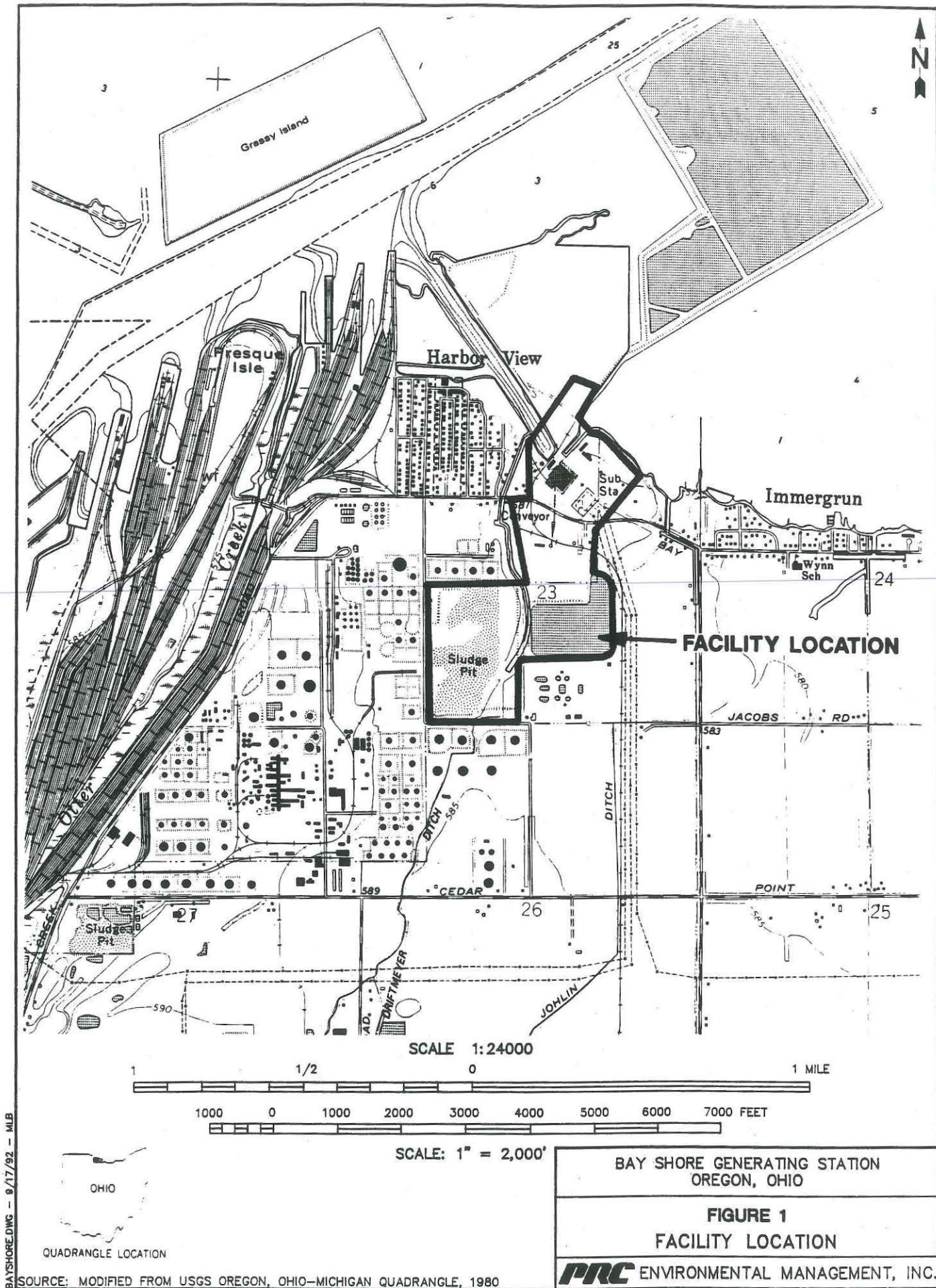
The facility is bordered on the north and northeast by the Maumee Bay, on the east by the City of Toledo's wastewater treatment facility, on the south and west by the British Petroleum Corporation, and on the northwest by a residential area.

2.2 FACILITY OPERATIONS

Bay Shore is a coal generating station used to provide electric power for Toledo Edison's distribution system. The Bay Shore facility occupies 580 acres of land along the Maumee Bay. Bay Shore operates in close correlation with Toledo Edison's Acme Generating Station (Acme), which is located approximately 5 miles southwest of the Bay Shore facility. Collectively, Bay Shore and Acme employ 386 people.

Toledo Edison has operated the Bay Shore facility since 1955. No information on land use prior to 1955 was discovered during the PA/VSI. Bay Shore has produced electrical power for the Toledo area since 1955. Beginning in 1955, one new generating unit was installed about every 3 years until 1968. After 1968, Bay Shore provided the majority of electrical power to the Toledo area, with Acme providing additional power during peak operating times.

Bay Shore was owned by Toledo Edison until 1986. At that time, Toledo Edison merged with Cleveland Electric Illuminating Company (CEI) to form Centerior Energy. Both Toledo Edison and CEI are now wholly-owned subsidiaries of Centerior Energy. The merger of the two companies was primarily a managerial one, with operations at most facilities involved remaining essentially unchanged. Toledo Edison and CEI exist to handle debt and customer billing.



During normal operations, Bay Shore produces small quantities of waste 1,1,1-trichloroethane (F001), waste petroleum naphtha (D001), and waste paint solvent (F003). These waste solvents are transported off site for recycling or fuel-blending by the Safety-Kleen Corporation (Safety-Kleen) (ILD 051 060 408). Bay Shore also produces small quantities of used antifreeze which is used on site to prevent the facility's coal conveyor belts from freezing during winter months.

Bay Shore generates used compressor oil that contains a high percentage of water. The used compressor oil is transported off site by an independent contractor (PRC, 1992b). Bay Shore also manages used transformer oil generated by maintenance of the facility's transformers. The used transformer oil is transported to Acme where it is picked up by an independent contractor for recycling (PRC, 1992c).

Since Bay Shore is a coal generating station, the facility produces fly and bottom ashes. Fly ash is collected and disposed of north of the facility, on property controlled by the Toledo Port Authority and the Corp of Engineers. Fly ash disposal involves placing fly ash in large excavated pits and covering the fly ash with clay. Bottom ash is wet-ponded on site. Effluent from the bottom ash ponds goes through on-site wastewater treatment and is discharged to Maumee Bay. Bay Shore also discharges boiler chemical cleaning solution and coal pile runoff to Maumee Bay. All effluent discharges are regulated by the facility's National Pollutant Discharge Elimination System (NPDES) permit.

Solid wastes generated by facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

The facility's SWMUs are identified in Table 1. The facility layout, including its SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2. The facility's Fly Ash Collection System (SWMU 2) and Wastewater Treatment Systems 1 and 2 (SWMUs 4 and 5) are outlined in Figure 3.

Bay Shore currently produces nine solid waste streams as a result of its operations: (1) waste 1,1,1-trichloroethane (F001); (2) waste petroleum naphtha (D001); (3) waste paint solvent (F003); (4) used compressor oil; (5) used transformer oil; (6) fly ash; (7) coal pile runoff; (8) bottom ash; and (9) boiler chemical cleaning solution.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Drum Storage Area	Yes	Administratively closed in 1984; currently active for less than 90-day storage
2	Fly Ash Collection System	No	Active
3	Retired Fly Ash Pond	No	Inactive since 1980
4	Wastewater Treatment System 1	No	Active
5	Wastewater Treatment System 2	No	Active

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

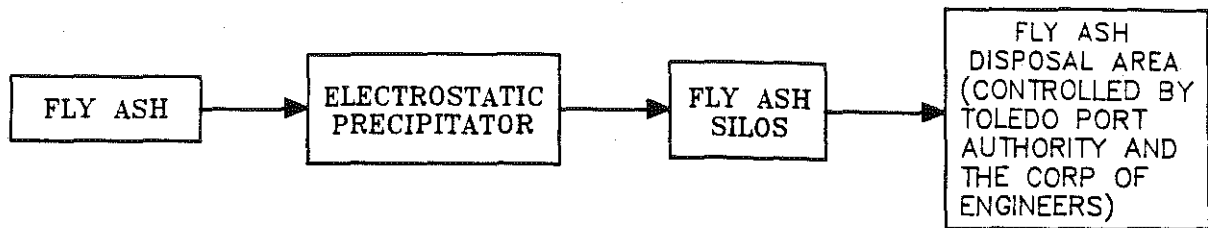
TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Waste 1,1,1-trichloroethane / F001	Degreasing of equipment, parts, and tools	1
Waste petroleum naphtha / D001	Degreasing of equipment, parts, and tools	None
Waste paint solvent / F003	Facility maintenance	1
Used compressor oil / NA	Facility compressors	1
Used transformer oil / NA	Transformer maintenance	1
Fly ash / NA	Coal power generation	2, 3, and 4
Coal pile runoff / NA	Atmospheric precipitation	4
Bottom ash / NA	Coal power generation	5
Boiler chemical cleaning solution / NA	Boiler maintenance	5

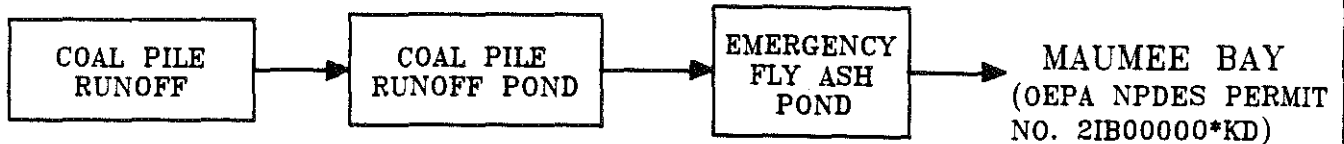
Notes:

^a Not applicable (NA) designates nonhazardous waste.

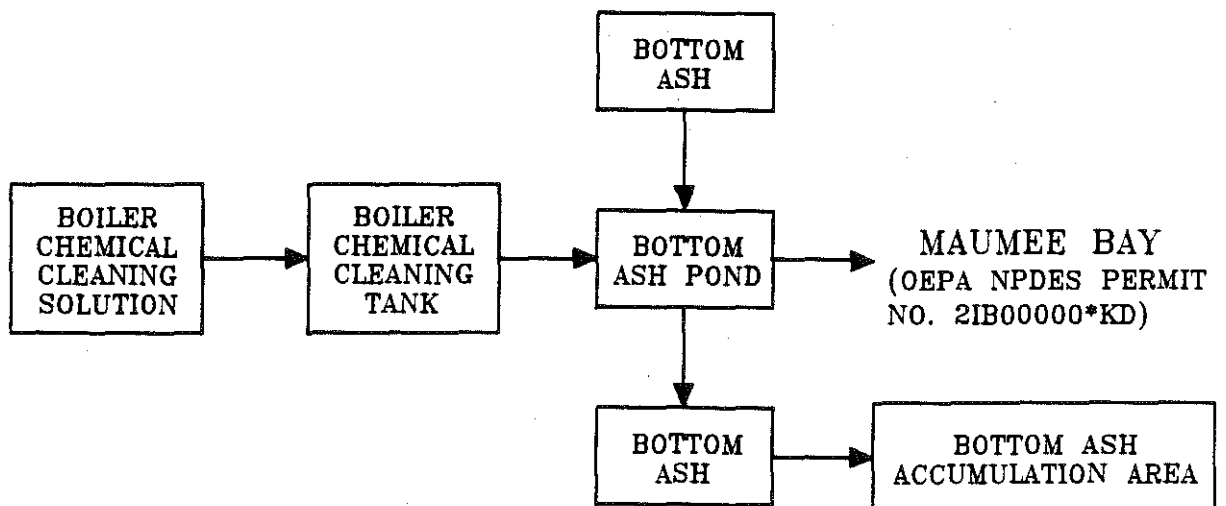
FLY ASH COLLECTION SYSTEM (SWMU 2)



WASTEWATER TREATMENT SYSTEM 1 (SWMU 4)



WASTEWATER TREATMENT SYSTEM 2 (SWMU 5)



BAY SHORE GENERATING STATION
OREGON, OHIO

FIGURE 3

SCHEMATICS OF FLY ASH DISPOSAL
AND WASTEWATER TREATMENT SYSTEMS

PRC ENVIRONMENTAL MANAGEMENT, INC.

During normal operations, Bay Shore generates small quantities of waste solvents. The facility has contracted Safety-Kleen to transport these hazardous wastes off site to be recycled or used in fuel-blending, on a monthly basis. Bay Shore uses 1,1,1-trichloroethane to degrease equipment, parts, and tools. After use, the waste 1,1,1-trichloroethane (F001) is stored in a steel, 55-gallon drum in the Drum Storage Area (SWMU 1) (see Photograph No. 1). Safety-Kleen transports the partially-filled drum off site and uses the waste 1,1,1-trichloroethane for fuel-blending. Bay Shore produced about 100 gallons of waste 1,1,1-trichloroethane during 1991 (PRC, 1992c).

Bay Shore also uses two 30-gallon parts washers for degreasing. The parts washers are located in the facility's shop and use petroleum naphtha in a continuous mode that recycles the solvent. Safety-Kleen inspects each parts washer, replaces it as needed, and recycles the waste petroleum naphtha (D001).

Occasionally Bay Shore's building maintenance operations generate waste paint solvent (F003). Waste paint solvent is collected in a steel, 55-gallon drum in the Drum Storage Area (SWMU 1). Safety-Kleen removes the waste paint solvent drum and replaces it with an empty drum when necessary. Safety-Kleen fuel-blends the waste paint solvent. Bay Shore produces about 10 to 20 gallons of waste paint solvent per year (PRC, 1992c).

Bay Shore also generates used compressor oil that contains a high percentage of water. The used compressor oil is collected in steel, 55-gallon drums or 250-gallon totes and stored in the Drum Storage Area (SWMU 1). Bay Shore produces approximately 1,000 gallons of used compressor oil per month (PRC, 1992d). Research Oil Corporation (Research Oil) of Cleveland, Ohio, has been contracted to transport the used compressor oil off site for recycling every 2 weeks (PRC, 1992b).

Bay Shore has several transformers on site that are periodically reconditioned or replaced. Oil is drained from these transformers and stored in steel, 55-gallon drums in the Drum Storage Area (SWMU 1) until it is transported to Acme. Once at Acme, Research Oil transports Bay Shore's and Acme's used transformer oil off site for recycling. Bay Shore tests the used transformer oil for polychlorinated biphenyls (PCB). Since 1980, Bay Shore has not found any used transformer oil to have PCB levels greater than 500 parts per million (ppm) which would require a special method of disposal (PRC, 1992f).

Bay Shore produces electricity by burning coal which produces fly and bottom ashes. Fly ash is managed by the Fly Ash Collection System (SWMU 2) (see Figure 3). Fly ash consists of very small, lightweight particles that easily remain airborne. These particles are collected using

an electrostatic precipitator and stored on site, in two fly ash silos (see Photograph No. 2). Prior to disposal, enough water is added to the fly ash to create a moist powder. This process eliminates any dust problems that might occur during the transportation and disposal of the fly ash. The moist fly ash is transported off site to an area north of the facility controlled by the Toledo Port Authority and the Corp of Engineers. This fly ash disposal area consists of a large excavation into which the fly ash is placed (see Photograph No. 3). When filled, the fly ash disposal area is covered with clay and seeded. Bay Shore has been using these methods to collect and dispose of fly ash since 1980.

Prior to 1980, Bay Shore wet-ponded all fly ash on site. There is a Retired Fly Ash Pond (SWMU 3) on the southeast end of the facility (see Photograph No. 4). This pond covers an area of approximately 25 acres. Fly ash was collected using electrostatic precipitators. Water was added to the fly ash to create a slurry which was piped to SWMU 3. The fly ash settled to the bottom of the pond and the effluent was discharged without further treatment to Maumee Bay according to the facility's NPDES permit. The Retired Fly Ash Pond was used for fly ash disposal from 1955 to 1980 (PRC, 1992f). After the pond reached maximum capacity, as much effluent as possible was discharged from the pond to Maumee Bay. The pond was then capped with clay and seeded.

Bay Shore currently has an emergency fly ash pond located at the southwest end of the facility which occupies about 66 acres (see Photograph No. 5). This pond is a component of Wastewater Treatment System 1 (SWMU 4) (see Figure 3). The emergency fly ash pond is used for the disposal of fly ash only if the Fly Ash Collection System (SWMU 2) is not operational. If this situation were to arise, water would be added to the fly ash to create a slurry which would be piped to the emergency fly ash pond. The effluent from the pond would then be discharged without further treatment to Maumee Bay according to Bay Shore's NPDES permit. Bay Shore has not used the emergency fly ash pond since 1980. The emergency fly ash pond was used for Bay Shore's fly ash disposal from 1974 to 1980 (PRC, 1992g). In addition, since 1986 Acme has disposed of its fly ash in the emergency fly ash pond (PRC, 1992g). For these reasons, a layer of fly ash has accumulated in the pond. Currently the emergency fly ash pond is overgrown with vegetation.

Coal pile runoff is also treated by Wastewater Treatment System 1 (SWMU 4). Bay Shore keeps approximately 180,000 tons of coal on site (PRC, 1992c). Any coal pile runoff that results from atmospheric precipitation is channeled to the coal pile runoff pond (see Photograph No. 6). At the coal pile runoff pond, the pH of the runoff is adjusted and the effluent is discharged to the emergency fly ash pond. Approximately 576,000 gallons of effluent from the coal pile runoff

pond is discharged to the emergency fly ash pond per year (Toledo Edison, 1990). This volume is not large enough to create a continuous discharge to Maumee Bay.

Bottom ash is also created when coal is burned to produce electricity. Bottom ash is managed by Wastewater Treatment System 2 (SWMU 5) (see Figure 3). It is combined with water to produce a slurry that is channeled to the bottom ash pond located at the north end of the facility (see Photograph No. 7). The bottom ash pond covers an area of 0.7 acre and is 12 feet deep. Each day, approximately half a million gallons of effluent from the bottom ash pond is discharged without further treatment to Maumee Bay in accordance with Bay Shore's NPDES permit (Toledo Edison, 1990). Bottom ash from the pond is removed three or four times per year (PRC, 1992e). This is done without draining the pond. Bottom ash is accumulated in the bottom ash accumulation area surrounding the bottom ash pond, and is used for roadways, berms, and dikes on site. Based on information provided by facility representatives during the VSI, Bay Shore has used all the bottom ash it has produced and has not had to dispose of any excess.

In addition to the bottom ash slurry, boiler chemical cleaning solution is also treated through Wastewater Treatment System 2 (SWMU 5) and discharged to the bottom ash pond. One or two boiler chemical cleaning operations are conducted every year. The boilers are cleaned using a three-step process that utilizes sodium bromate, hydrochloric acid, and caustic. The boilers are rinsed with clean water between each step. The solution from this process is channeled to the boiler chemical cleaning tank for pH adjustment. The boiler chemical cleaning tank has a 60,000-gallon capacity (see Photograph No. 8) (PRC, 1992e). When the pH of the boiler chemical cleaning solution is adjusted, copper in the solution is plated out onto a steel plate in the boiler chemical cleaning tank and iron in the solution precipitates out. However, not enough copper or iron are recovered to warrant collection or disposal and therefore remain in the tank (PRC, 1992b). After treatment, the boiler chemical cleaning solution is channeled to the bottom ash pond where it is discharged to Maumee Bay along with bottom ash effluent.

Bay Shore performs a limited amount of vehicle maintenance that produces small quantities of used antifreeze. Used antifreeze is collected in a steel, 55-gallon drum in the Drum Storage Area (SWMU 1). Bay Shore generates about 10 to 20 gallons of used antifreeze per year (PRC, 1992c). Bay Shore keeps the used antifreeze on site and reuses small amounts during winter months to prevent the coal conveyor belt and rotors from freezing. Bay Shore has not had to dispose of any excess used antifreeze, and for this reason, the used antifreeze is not considered a solid waste (PRC, 1992a).

2.4

HISTORY OF DOCUMENTED RELEASES

The Bay Shore facility has no history of documented releases of hazardous wastes or hazardous constituents to ground water, surface water, air, or on-site soils.

2.5

REGULATORY HISTORY

Bay Shore submitted a Notification of Hazardous Waste Activity to EPA on August 14, 1980 (Toledo Edison, 1980a). Bay Shore submitted a RCRA Part A permit application on November 17, 1980 with a process code of S01 (container storage) for 4,500 gallons of F001, F002, F003, F004, and F005 wastes annually (Toledo Edison, 1980b).

From 1980 to 1984, Bay Shore was regulated as a generator, treatment, storage, or disposal (TSD) facility, and transporter of hazardous waste (Toledo Edison, 1980a). On September 24, 1984, EPA changed Bay Shore's status to a small-quantity generator storing waste for less than 90 days (EPA, 1984). The facility currently operates with this status.

Administrative closure of Bay Shore's container storage area was completed when EPA changed the facility's regulatory status. Bay Shore did not submit an official closure plan to either EPA or OEPA for this area.

On July 24, 1981, OEPA conducted a RCRA inspection at the Bay Shore facility. This inspection found minor paperwork deficiencies (OEPA, 1981). Subsequent RCRA inspections on May 10, 1982, May 19, 1983, and July 11, 1984 found the Bay Shore facility to be in compliance with EPA regulations (OEPA, 1982; OEPA, 1983; and OEPA, 1984). A RCRA inspection conducted on March 5, 1992 found minor paperwork deficiencies (for example, incomplete documentation of weekly inspections of emergency equipment) (OEPA, 1992a). Bay Shore took corrective actions, and by April 6, 1992, OEPA considered the facility in complete compliance (OEPA, 1992b).

Bay Shore is required to have operating air permits. Under these permits, the facility may only discharge 0.1 pound of particulate matter per British thermal unit (Btu) of heat input and 1.94 pounds of sulfur dioxide per 10^6 Btus of heat input. The facility's operating air permits also limit opacity to 29 percent. Bay Shore has not violated its air permits. The facility has no history of odor complaints from area residents.

Bay Shore discharges effluent from Wastewater Treatment Systems 1 and 2 (SWMUs 4 and 5) and the facility's sanitary sewer system to the Maumee Bay. These discharges are permitted by

2.6.3 Geology and Soils

Little site-specific geological information is available. The following is based on county and regional information.

Lucas County is on a nearly level plain. The landscape slopes gently to the southeast toward the Maumee River and northeast toward Lake Erie. The soils in the region are loamy, clay-like, and post-glacial in nature. Most of the bedrock in the area is at a depth of 20 to 60 feet (USDA, 1980).

Well logs within 1 mile of the facility begin to find limestone from 80 feet to 125 feet below ground surface (bgs). The limestone extends to at least 130 feet bgs, which is the depth of the deepest area well (ODNR, 1992).

2.6.4 Ground Water

The main supply of ground water from the area is located in the sandy area of the county where water collects above the impervious glacial till. The water table ranges from a depth of 15 to 25 feet bgs (USDA, 1980). Studies by ODNR have determined that most of the water-bearing bedrock is dolomite (USDA, 1980). The amount of water in this rock depends on the size and number of small cavities in the rock (USDA, 1980).

Four well logs from within 1 mile of Bay Shore have found the static water level in bedrock to vary between 42 to 60 feet (ODNR, 1992).

2.7 RECEPTORS

The Bay Shore facility occupies 580 acres in a mixed-use area in Oregon, Lucas County, Ohio. Oregon has a population of 18,334 (Rand McNally, 1993).

The facility is bordered on the north and northeast by Maumee Bay, on the east by the City of Toledo's Wastewater Treatment facility, on the south and west by the British Petroleum Corporation, and on the northwest by residences. The nearest residential area is located about 0.1 mile northwest of the facility. The Wynn School is located 0.6 mile to the east of the facility.

The nearest surface water body, Maumee Bay, borders the facility on the north and northeast and is used for recreational and industrial purposes. Other surface water bodies in the

OEPA NPDES Permit No. 2IB00000*KD. This permit limits the pH and total suspended solids of the discharges (OEPA, 1990).

Bay Shore has no underground storage tanks on site. In addition, no CERCLA activities are conducted on site.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate of Lucas County is moderated by its proximity to Lake Erie. The average daily temperature is 49 degrees Fahrenheit (°F). The lowest average daily temperature is 23°F in January. The highest average daily temperature is 72°F in July (USDA, 1980).

The total annual precipitation for the county is 31 inches (USDA, 1980). The mean annual lake evaporation for the area is 31 inches (USDC, 1968). The heaviest 1-day (24-hour) rainfall during the period of 1955 to 1975 was 4.34 inches in July 1969 (USDA, 1980).

The prevailing wind is from the west-southwest with a maximum average wind speed of 11 miles per hour in April (USDA, 1980).

2.6.2 Flood Plain and Surface Water

The majority of the Bay Shore facility is located outside the 500-year flood plain in an area of minimal flooding. The 100-year flood plain extends about 250 feet inland from the facility's shoreline (FEMA, 1978). No SWMUs or buildings are located in the 100-year flood plain. The nearest surface water body, Maumee Bay, borders the facility on the northeast and is used for recreational and industrial purposes.

Surface water runoff from the facility, other than coal pile runoff, is directed to storm sewers that discharge to Maumee Bay.

area include the Maumee River, located 2 miles east of the facility, and the Driftmeyer and Johlin Ditches, located south of the facility.

Ground water is not used as a municipal water supply. Ground water is used for industrial purposes in the area. The nearest industrial well is located on property bordering Bay Shore on the south and west, owned by the British Petroleum Corporation.

Sensitive environments are located adjacent to the facility and on site. Maumee Bay borders the facility on the north and northeast. A wetland of approximately 4 acres is located at the southeast end of the facility (USDI, 1977).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Drum Storage Area

Unit Description:	This unit is divided into a product storage area and a waste storage area. This unit is located outdoors, on a concrete floor, and covered by a roof. Aluminum walls enclose the unit on three sides.
Date of Startup:	This unit began operation in 1980.
Date of Closure:	This unit underwent administrative closure in 1984 and is currently active for less than 90-day storage.
Wastes Managed:	This unit manages waste 1,1,1-trichloroethane (F001), waste paint solvent (F003), used antifreeze, used compressor oil, and used transformer oil. Waste 1,1,1-trichloroethane and waste paint solvent are transported off site by Safety-Kleen for recycling or fuel-blending. Used antifreeze is reused on site to prevent the facility's coal conveyor belt and rotors from freezing and is not considered a solid waste. Used compressor oil is transported off site by Research Oil for recycling. Used transformer oil is transported to Acme where it is picked up by Research Oil for recycling.
Release Controls:	This unit is located in an enclosed area with a concrete floor. The concrete floor is sloped towards a trap located in the center of this unit. Individual drums in this unit are kept closed.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	This unit was in good condition at the time of the VSI. The concrete floor of this unit was not cracked and the walls and roof

provided protection from precipitation, sun, and wind. PRC noted no evidence of release (see Photograph No. 1).

SWMU 2

Fly Ash Collection System

Unit Description:

This unit consists of electrostatic precipitators and fly ash silos located outdoors. The electrostatic precipitators are constructed of steel and concrete. The fly ash silos are constructed of steel.

Date of Startup:

The electrostatic precipitators began operation in 1955. The fly ash silos began operation in 1980.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages fly ash.

Release Controls:

The electrostatic precipitators and fly ash silos of this unit are completely enclosed units.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

The components of this unit were located over gravel and concrete areas. The steel housing surrounding each electrostatic precipitator was intact and showed no signs of corrosion. The steel of the fly ash silos showed no signs of corrosion. PRC noted no evidence of release (see Photograph No. 2).

SWMU 3

Retired Fly Ash Pond

Unit Description:

This unit was a fly ash pond located at the southeast end of the facility. Effluent from this unit was discharged to Maumee Bay as permitted by OEPA NPDES Permit No. 2IB00000*KD. After reaching maximum capacity, the pond was capped with clay and seeded.

Date of Startup:

This unit began operation in 1955.

Date of Closure: This unit has been inactive since 1980.

Wastes Managed: This unit managed fly ash.

Release Controls: This unit is located in clay-like soil and has been capped with clay and seeded.

History of Documented Releases: No releases from this unit have been documented.

Observations: This unit was overgrown with vegetation at the time of the VSI (see Photograph No. 4).

SWMU 4

Wastewater Treatment System 1

Unit Description: This unit consists of the emergency fly ash pond and the coal pile runoff pond. The emergency fly ash pond occupies about 66 acres on the southwest end of the facility. The pond would only be used to manage fly ash if the Fly Ash Collection System (SWMU 2) were not operational. The coal pile runoff pond is used to adjust the pH of coal pile runoff due to atmospheric precipitation. Effluent from the coal pile runoff pond is channeled to the emergency fly ash pond from where it is discharged to Maumee Bay under OEPA NPDES Permit No. 2IB00000*KD. The volume of this effluent is not large enough to create a continuous discharge to Maumee Bay.

Date of Startup: The emergency fly ash pond began operation in 1974. The coal pile runoff pond began operation in 1975.

Date of Closure: This unit is active.

Wastes Managed: This unit currently manages fly ash under emergency conditions when the facility's normal methods of fly ash collection and disposal are not operational. From 1974 to 1980, the emergency fly ash pond was used for Bay Shore's fly ash disposal. Since 1986 Acme has been disposing its fly ash in the emergency fly ash pond. This unit also manages coal pile runoff.

Release Controls: The emergency fly ash pond and the coal pile runoff pond are both located in clay-like soil.

History of Documented Releases: No releases from this unit have been documented.

Observations: The emergency fly ash pond was overgrown with vegetation at the time of the VSI (see Photograph No. 5). The coal pile runoff pond was partially filled at the time of the VSI (see Photograph No. 6).

SWMU 5 Wastewater Treatment System 2

Unit Description: This unit consists of the bottom ash pond, the bottom ash accumulation area, and the boiler chemical cleaning tank. Bottom ash is slurried and channeled to the bottom ash pond which covers 0.7 acres and is 12 feet deep. Bottom ash is removed from the pond three or four times per year and stored at the bottom ash accumulation area surrounding the bottom ash pond. Solution from boiler chemical cleaning operations is treated at the boiler chemical cleaning tank which has a 60,000 gallon capacity. At the boiler chemical cleaning tank the pH of the solution is adjusted and copper and iron are plated and precipitated out, respectively. Effluent from the boiler chemical cleaning tank is channeled to the bottom ash pond. Effluent from the bottom ash pond is discharged to Maumee Bay under OEPA NPDES Permit No. 2IB00000*KD.

Date of Startup: The bottom ash pond and the bottom ash accumulation area began operation in 1955. The boiler chemical cleaning tank began operation prior to 1975.

Date of Closure: This unit is active.

Wastes Managed: This unit manages bottom ash and boiler chemical cleaning solution.

Release Controls: The bottom ash pond and the bottom ash accumulation area are located on clay-like soil and have accumulated a thick layer of

bottom ash. The boiler chemical cleaning tank is constructed of concrete.

History of
Documented Releases:

No releases from this unit have been documented.

Observations:

The bottom ash pond was partially filled and bottom ash was accumulated in the area surrounding the pond at the time of the VSI (see Photograph No. 7). The boiler chemical cleaning tank was out of service at the time of the VSI. The concrete of the tank appeared in good condition with no apparent cracks at the time of the VSI (see Photograph No. 8).

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the Bay Shore facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1

Drum Storage Area

Conclusions:

This unit stores waste 1,1,1-trichloroethane (F001), waste paint solvent (F003), used antifreeze, used compressor oil, and used transformer oil. Hazardous wastes are not stored in this unit for greater than 90 days. The waste 1,1,1-trichloroethane and waste paint solvent are transported off site by Safety-Kleen for recycling or fuel-blending. Used antifreeze is used on site to prevent the facility's coal conveyor belt and rotors from freezing and is not considered a solid waste. Used compressor oil is transported off site by Research Oil for recycling. Used transformer oil is transported to Acme where it is picked up by Research Oil for recycling. Since this unit is an enclosed area with a concrete floor, is well managed, and the individual drums of this unit are kept closed, there is a low potential for a release to ground water, surface water, air, and on-site soils.

Recommendations:

PRC recommends no further action for this SWMU at this time.

SWMU 2

Fly Ash Collection System

Conclusions:

This unit manages fly ash. Since the electrostatic precipitators and the fly ash silos of this unit are completely enclosed units, there is a low potential for release to ground water, surface water, air, and on-site soils.

Recommendations:

PRC recommends no further action for this SWMU at this time.

RELEASED 2/20/01
DATE _____
RIN # _____
INITIALS WJV

SWMU 3

Retired Fly Ash Pond

Conclusions:

This unit managed fly ash from 1955 to 1980. Since the Retired Fly Ash Pond is no longer in use, is located in clay-like soil, and has been capped with clay and seeded, there is a low potential for release to ground water, surface water, and air. Normal operations of this unit and its present state constitute a release to on-site soils. However, because of the nonhazardous nature of fly ash, SWMU 3 poses minimal threat to human health and the environment.

Recommendations:

PRC recommends no further action for this SWMU at this time.

SWMU 4

Wastewater Treatment System 1

Conclusions:

This unit manages fly ash in an emergency situation and coal pile runoff. Since the components of this unit are located in clay-like soil and discharges to Maumee Bay are regulated under the facility's NPDES permit, there is a low potential for release to ground water, surface water, and air. Normal operation of this unit constitutes a release to on-site soils. However, the nonhazardous nature of the wastes managed allows this unit to operate with minimal threat to human health and the environment.

Recommendations:

PRC recommends no further action for this SWMU at this time.

SWMU 5

Wastewater Treatment System 2

Conclusions:

This unit manages bottom ash and boiler chemical cleaning solution. Since the bottom ash pond and bottom ash accumulation area are located on clay-like soil and discharges to Maumee Bay are according to the facility's NPDES permit, there is a low potential for release to ground water, surface water, and air from these components of SWMU 5. Normal operations of the bottom ash pond and bottom ash accumulation area constitute a release to on-site soils. However, the nonhazardous nature of bottom ash allows these components to pose minimal threat to human health and the environment. Since the concrete of the boiler chemical cleaning tank is in good condition with no apparent cracks, there is a low potential for release to ground water, surface water, air, and on-site soils from this component of SWMU 5.

ENFORCEMENT
CONFIDENTIAL

Recommendations: PRC recommends no further action for this SWMU at this time.

RELEASED

DATE

RIN #

INITIALS

2/20/01
LWV

TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Drum Storage Area	1980 to present	None	None
2. Fly Ash Collection System	1955 to present; the electrostatic precipitators of this unit began operation in 1955; the fly ash silos of this unit began operation in 1980	None	None
3. Retired Fly Ash Pond	1955 to 1980	None	None
4. Wastewater Treatment System 1	1974 to present; the emergency fly ash pond of this unit began operation in 1974; the coal pile runoff pond of this unit began operation in 1975	None	None
5. Wastewater Treatment System 2	1955 to present; the bottom ash pond and bottom ash accumulation area of this unit began operation in 1955; the boiler chemical cleaning tank of this unit began operation prior to 1975	None	None

RELEASED
DATE 2/20/11
RIN #
INITIALS WJW

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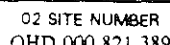
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ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



08 CONG
DIST

EPA FORM 2070-12 (7-81)

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

BAY SHORE GENERATING STATION

4701 Bay Shore Road
Oregon, Ohio
OHD 000 821 389

Date: August 13, 1992

Primary Facility Representative: Ray Zucker
Representative Telephone No.: 216/447-3203
Additional Facility Representatives: Matt Collins
Rich Alexander

Inspection Team: Sandy Anagnostopoulos, PRC Environmental Management,
Inc. (PRC)
Cathy Collins, PRC

Photographer: Sandy Anagnostopoulos, PRC

Weather Conditions: Cloudy, light wind, approximately 70°F.

Summary of Activities: The visual site inspection (VSI) began at 8:00 a.m. with an introductory meeting held at the Acme facility. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour of the Acme facility began at 9:00 a.m. The Acme tour concluded at 10:00 a.m. The VSI tour of Bay Shore began at 10:30 a.m. Following the Bay Shore tour, the inspection team and facility representatives returned to Acme where an exit meeting was held. The VSIs were completed and the inspection team left the Acme facility at 12:00 p.m.



Photograph No. 1

Orientation: West

Description: This photograph shows the Drum Storage Area used to store waste solvents, used antifreeze, used compressor oil, and used transformer oil.

Location: SWMU 1

Date: 8/13/92



Photograph No. 2

Orientation: North

Description: This photograph shows an electrostatic precipitator and the fly ash silos used to store fly ash.

Location: SWMU 2

Date: 08/13/92



Photograph No. 3

Location: Fly ash disposal area

Orientation: Northeast

Date: 08/13/92

Description: This photograph shows the fly ash disposal area controlled by the Toledo Port Authority and the Corp of Engineers.



Photograph No. 4

Location: SWMU 3

Orientation: Northwest

Date: 08/13/92

Description: This photograph shows the Retired Fly Ash Pond, which has been capped with clay and seeded.



Photograph No. 5

Orientation: Southwest

Location: SWMU 4

Date: 08/13/92

Description: This photograph shows the emergency fly ash pond, which was overgrown with vegetation at the time of the VSI.



Photograph No. 6

Orientation: North

Location: SWMU 4

Date: 08/13/92

Description: This photograph shows the coal pile runoff pond.



Photograph No. 7

Orientation: Southeast

Location: SWMU 5

Date: 08/13/92

Description: This photograph shows the bottom ash pond and bottom ash accumulation area.



Photograph No. 8

Orientation: West

Location: SWMU 5

Date: 08/13/92

Description: This photograph shows the empty boiler chemical cleaning tank, which is used approximately once per year.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

(20)

ACME ~~BAR~~ STORE:

RICH ALEXANDER
MATT COLLINS
RAY ZUCKER
CLOUD & LIGHT
WINDS 220F

BOTH FACILITIES
CURRENTLY OPERATE AS
SQG

ACME COAL FIRED
GENERATING STATION
1918 OPERATE TO
SATISFY PEAK NEEDS
NOT ALWAYS IN
SERVICE

(35)

3 Pulverized coal
cycles
Boiler
Collect Fly Ash
Electr. G.P.
Slurry for fly Ash
Ponding
Size of unit
Operated #2 Cycle
29 - Mega watt
Boiler
#6 Cycle 115 MW
Steam is produced
for 1 unit
#5 Cycle
1 turbine + 3 boilers

(36)

N.G. + Propane is
used for lighter supply
to light the Coalf
No Oil for
lighter supply
6-10⁶ + 2-10⁶ oil
Tank
Leased to
Sanaca Oil
who are then to
store material for
making asphalt product
Circulating.

Storage transformer oil

(37)

underground
by #16
Acme
tank
boiler.
1983 + 1985
started separating
waste streams
Waste Oil
Oil From Equipment
4 DRUMS OR 250
GALLON TOTES
CURRENT HW. PARTS
STREAN FOR PARTS
CLEANING +
DEGREASING
PAINT WASTE

(38)

Produce A very
small amount of
waste nitrocell

N.H.

Waste oil

Boiler Chemical

Cleaning

Discharge to Ash Pond
Waste from regenerating

on exchange Eat
Treatment Sludge

Bay Shore

taken off-site
for disposal

(39)

Acres 111 acres

Bay Shore 500 acres

300 EMPLOYEES

between Acme &

Bay Shore

Acme

Fly Ash

Wet Ponded

Effluent IS

Discharged to Muncie

Bay Shore Station

4 Generating

Unit 650 MW

Pulverized Coal

Fired units Turbine

ESF

All coal is

Wheat Va.

Low S.

(40)

1980 new ESP

Fly ash is dry in
collected

two large silos

mixed w/ H₂O to to

dump trucks to to

Confined Disposal
Facility and is

placed in the

CDF

Use for Lighting

Purposes Only.

Once Combustion

Commences Oil

Water is removed

Cooling H₂O is

closed from silos

(41)

Combustion gas is fired

back into peak

units for only

AIR Permits

to operate

limits .14% of

PM .14% of

SO₂ - B.S. - 1.98 ¹⁶/₁₀

opacity 20% Acme

29% B.S.

B.S. Emission

for P.M. opacity

is allowed by

(12)

AIR PERMITS

Roadways
Fly Ash
Coal
Coal Delivery
Use Reasonable
methods to control
dust generation

NPDES

Acme 2 permits
1 - Cooling H_2O
Fly Ash 3.10°
Waste water Treated
floor drain
Storm water
0 spd 1.9.10° gpd
Selling material, ^{settling} ~~settling~~ ^{solid}
Pollutants \checkmark SS \checkmark pH

(13)

oil & grease
are required
to write for AS
B.S. 3 outfalls
cooling H_2O 745.10° pd
Bottom ash 1.3 MGD
Sanitary - Sewage
Treatment system
Acme 1 - To Control
bio-fouling in condenser
1.5 vs 12 daily
B.S. use bromine
fly ash & bottom
ash TSS & H
& oil & grease

(14)

Sample - BOD
F.C., S.S., N, P

B.S. commenced
operations 1955.

COMMENCE
TOUR
9:00

Hazardous Material
Dr Disposal Material
1 Pails washer Area
1 Dr Print Waste
1 Dr Used Antifreeze
on Concrete

Photo 1

Indoors

No 1 rain

55 GALLONS

Drum

(15)

Under ground
oil storage Tank

Photo 2 underground
storage tank
Haven't used it in

FORMERLY USED AS
Coke oven gas
drip line
Stopped using in 1983

EST
Hydrovac Ash
out of
1773
large H₂O to indoor
vacuum

Photo 3 ORIENT
NO SIGNS OF

(46)

SPILCS OUT DOORS
ON A Concrete

area.
Concrete Tank

2 Fly ash
Pond
Photo 4 Full
Photo 5 Empty

Unlined
Silver 1984
Fly ash
managel
Fly Ash

MAVME

(47)

Boiler Chemical
cleaning Tank
of Bottom ash

Photo 6
Photo 7

Adjust pH w/
 H_2SO_4 & sodium hydroxide
settled metals

at the bottom
of the tank
Iron & Copper - PLATE
METALS

Pump water to
Fly ash pond
Concrete tank

Boiler Cleaning
Sodium Bromate

HCl & Caustic
Clean Boiler

Every 4 years

(48)

Clarifiers

WW Treatment

System

H₂O from
bottom ash

Selling Basin
of Clarifiers

Photo 8 B

Clarifiers

All tanks are

concrete

Tall steel

tank contains

benzene clay

No Signs of

spills or leaks

Recirculate Water

Cooling Water

(49)

Photo 9

Bottom

area - use

roadway and

to line fly ash

pond

accumulation

for

and

fly ash

pond

Photo 10

Bottom

fly ash pond

vegetation

erect

unit

Photo 9 1 a 92

fly ash pond

vegetation

erect

unit

Four Oil Storage

Tanks

All are above

ground on

soil and gravel

(50) Transformer
Water oil is
taken to the
Belame Service
center
Ultimately goes
to Collector
Lives and
photogram
Photo "
The unit is
surrounded by
gravel like
no signs of
spills or leaks

(51)
Settling basin
Coal Pile Runoff
+ plant drain
Concrete
Photo 12 No SIGNS
OF SPILLS
OR LEAKS
Photo 13 Pile
Coal Runoff
Accumulation
The unit was
steel with a
concrete lip Runoff
manages water from
pile

(52)

1030 Bay Shore
Emergency Filx
Ash Pond.

OIL Storage
Tank for
Peaking Unit
Surrounded by
GRAVEL Dike

Sudbe Surround
Coal pile which
surrounds

Photo cnc-7 and. 11
Fly Ash Pond.
Coal Pile Runoff
Pond

(53)

Pump Water to
Dv Port Pond
to Settling Basin
NPDs

b

cnc Dv Port Pond CLAY LINED
OBFly Ash Photo 25K
Acme Photo 3 NW
Material

PHOTO Dry Fly
Ash SILD

BOILER CHEMICAL
CLEANING PLANT

BOTTOM Ash Pond
PHOTO 5
A cumulative

(54)

Bottoms Ash
Use to make
Roadways &
to line
at ponds

Combined Disposal
Facility

PHOTO
ORIENT
Disposal of
Fly ash

CAP OFF UNIT
WITH CLAY
ESCAPE TO
DIP BAG

(55)

FILTER TO
FLY ASH SILE
ADD MOISTURE
TO PREVENT
DUST

LIGHTER OIL IN
TANKS ABOVE GROUND
& DIKED

PHOTO

USED OIL STORED

IN 55-GALLON

DRUMS ON

WOODEN SEEDS

TRAP RUNS THROUGH

CENTER OF BUILDING

CONCRETE IN

COVERED AREA

18

THIS UNIT
IS DIVIDED INTO
PRODUCT STORAGE
OIL STORAGE
& The Hazardous
Material STORAGE
They have 3
250 GALLON
TOTES ON SITE
DOO 1 55 GALLONS
FOO 3
NO SIGNS
OR SPILLS OR
LEAKS THIS
UNIT WAS
BUILT IN 1991
PHOTO 7

(57)

CHEMICAL TREATMENT
TANK
CONCRETE
SEALANT ON
THE INSIDE
PLATE METALS
GUT
BOTH FACILITIES
SURROUNDED BY
2-8" FENCE
GUARDS & Television
Camera. PRC off
12 pm
Site

Cathy M. Allen

